Salt Wells - Pilot Butte

GRAZING

Final Environmental Impact Statement

United States Department of the Interior Bureau of Land Management Rock Springs District, Wyoming

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Wyoming State Office
P.O. Box 1828
Cheyenne, Wyoming 82001

IN REPLY
REFER TO:

1792 (420)

Dear Reviewer:

This is Volume 2 of the final environmental impact statement (FEIS) of the Bureau of Land Management's proposal for management of livestock grazing on over three million acres of public and private land in the Salt Wells Resource Area and in the Pilot Butte portion of the Big Sandy Resource Area, Rock Springs District, Wyoming. The draft EIS constitutes Volume 1 of the FEIS since no major changes in the alternatives proposed, affected environment described, or environmental consequences presented are necessary.

Volume 2 includes the comments on the draft EIS submitted by the public during the public review period and, where appropriate, revisions to the Volume 1. It also includes the Bureau's responses to substantive comments. All comments will be used in the decision-making process.

We wish to express the Bureau's appreciation to those reviewers who took the time to write their comments on this document. The Bureau considers such input to be valuable in determining management for this area. The public will have further opportunities to participate in the decision-making process.

Prior to making decisions on grazing management for the Salt Wells - Pilot Butte area, the Bureau will accept written comments on the content on the FEIS and the proposed Management Framework Plan decisions through October 31, 1983. Comments should be addressed to:

Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
P.O. Box 1170
Rock Springs, Wyoming 82902-1170

Sincerely yours,

Richard T. Rivera

State Director

FINAL

ENVIRONMENTAL IMPACT STATEMENT

PROPOSED GRAZING MANAGEMENT PROGRAM FOR THE SALT WELLS-PILOT BUTTE AREA

SWEETWATER AND UINTA COUNTIES, WYOMING

Prepared by:

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

ROCK SPRINGS DISTRICT

STATE DIRECTOR

WYOMING STATE OFFICE

September 1983

COVER SHEET

Salt Wells-Pilot Butte Grazing

Environmental Impact Statement

( ) Draft (X) Final

Lead Agency

U.S. Department of the Interior, Bureau of Land Management

Cooperating Agencies

U.S. Department of Agriculture, Forest Service
U.S. Department of the Interior, Bureau of Reclamation

Counties That Could Be Directly Affected

Sweetwater and Uinta Counties, Wyoming

Abstract

This environmental impact statement (EIS) assesses the environmental consequences of the Bureau of Land Management's implementation of a proposed livestock grazing management program for the Salt Wells-Pilot Butte area of southwestern Wyoming. The proposed action includes "improvement" category management on eighteen allotments totalling 1,006,929 acres; "maintenance" category management on five allotments totalling 2,166,010 acres; and "custodial" category management on seven allotments totalling 9,343 acres. Proposed range improvements include 70 water developments; vegetation treatment on 52,973 acres; and 160 miles of fence in the "improvement" category allotments. Other major components of the proposed action include reduction of wild horse numbers to the herd management plan levels in four wild horse herd management areas; licensing of projected increases in forage production to livestock operators until suspended preference is restored; providing yearlong habitat for wildlife, recognizing that State and private lands also provide wildlife habitat proportional to their productivity; and assigning range improvement maintenance responsibility as specified in the Rangeland Improvement Policy. Bureau rangeland monitoring procedures would be utilized to evaluate the effectiveness of the grazing program, and changes in management will be based on data resulting from this monitoring.

The environmental consequences of alternatives to the proposed livestock grazing program are assessed in this EIS. Those alternatives include Continuation of the Existing Situation (No Action); Emphasize Livestock Production; Emphasize Watershed, Wildlife Habitat, and Soil Stability; and License No Livestock Use on Public Lands.

Based on the issues and concerns identified during the scoping process, the EIS focuses on the impacts to soils and vegetation, watershed, wildlife, the livestock industry, recreation and visual resources, aquatic habitat, and socioeconomic conditions.

EIS Contact

Comments on this EIS should be directed to:

Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
P.O. Box 1170
Rock Springs, Wyoming 82902-1170
(307) 362-8407

Date By Which Comments on the EIS Must Be Received:

BLM decisions on grazing management for the Salt Wells-Pilot Butte area will not be made until at least 30 days after the EPA Final EIS Notice of Availability has appeared in the ***Federal Register***. During that 30-day period, written comments on the content of this Final EIS and the proposed Management Framework Plan decisions will be accepted at the address noted above. Comments will be considered in the BLM decision-making process. A Rangeland Program Summary will be prepared and issued within five months following the publication of this EIS.

Date EIS Made Available to EPA and the Public:

Draft: May 31, 1983
Final: September 29, 1983

TABLE OF CONTENTS

SECTION 1

SUMMARY

This document is Volume 2 of the ***Salt Wells-Pilot Butte Grazing Final Environmental Impact Statement (EIS)***, since no major revisions in the proposed action, alternatives, and impact analysis contained in the Draft EIS (Volume 1 of the final EIS) are required. The EIS analyzes the effects of livestock grazing on over 3 million acres of land within the Bureau of Land Management (BLM) Rock Springs District, Wyoming. This document will be used to assist in determining the future course of grazing management in the area. This EIS examines five alternatives:

A. The Proposed Action, which is the Bureau's preferred alternative.
B. Continuation of the Existing Situation (No Action)
C. Emphasize Livestock Production
D. Emphasize Watershed, Wildlife Habitat, and Soil Stability
E. License No Livestock Use on Public Lands

Some of the major issues with respect to grazing which were identified in the scoping process are:

1. Management of riparian bottomlands.
2. Gully headcutting of drainages.
3. Maintaining wildlife habitat.
4. Maintaining the economic base for the local livestock industry.
5. Wild horse management.
6. The effects of livestock grazing on soils, watershed, vegetation, recreation, cultural, visual, and wilderness resources.

AREA OF ANALYSIS

The Salt Wells Resource Area and the Pilot Butte portion of the Big Sandy Resource Area encompass approximately 3,294,355 acres located in southwest Wyoming, the vast majority of which is contained within Sweetwater County. A small amount of the land is within Uinta County. Map 1-1 shows the overall location within the State of Wyoming.

The Salt Wells-Pilot Butte area is entirely within the Rock Springs District of the BLM. The area contains a variable pattern of land ownership (see Map 1-2 of Volume 1). Ownership includes public land administered by the Bureau of Land Management (1,863,653 acres); other Federal land (134,327 acres), State of Wyoming lands (92,359 acres); and lands owned by various private individuals or organizations (1,091,943 acres). Some lands (112,073 acres) within the area's boundary are not utilized for grazing, or are not used in conjunction with public land. These lands are discussed in Volume 1, but only in terms of the overall socioeconomic impacts.

The land pattern is characterized by "checkerboard" and solid block ownership. Approximately two-thirds of the area is checkerboard, a land pattern in which private landowners generally control the odd-numbered sections and the BLM administers the even-numbered sections. Exceptions to this include homesteaded lands and State holdings. The alternating land pattern, when depicted on a map, resembles a checkerboard (see cover). One-third of the area is solid block lands which are predominantly federally owned with small tracts of private and State tracts scattered throughout the solid block.

THE PROPOSED ACTION

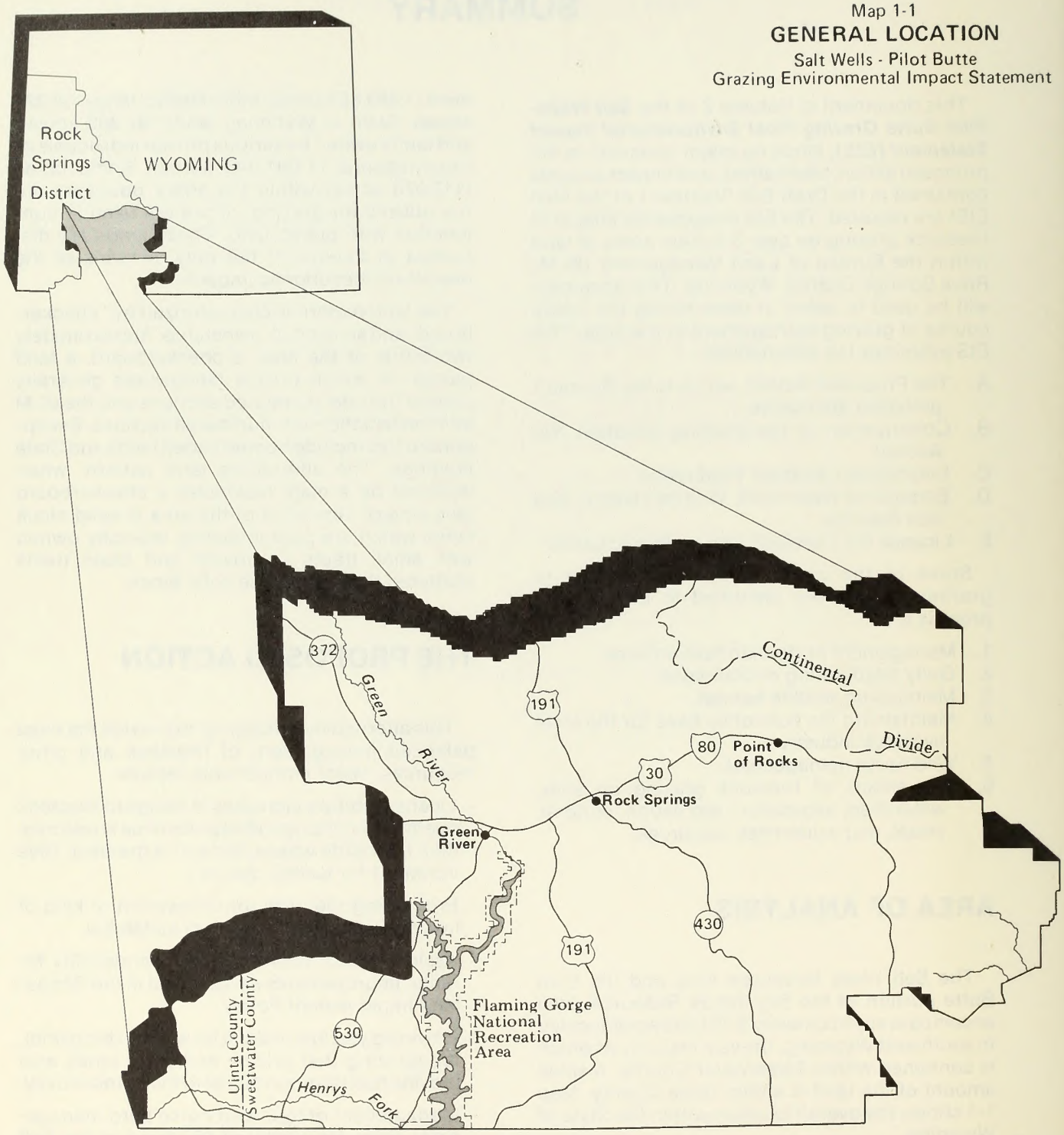
This alternative is designed to provide the most balanced management of livestock and other resources. Major components include:

- Licensing future increases in forage to livestock operators until suspended preference is restored, then distribute where demand is greatest. (See Volume 1 for further details.)
- Processing requests for conversion of kind of livestock following a study of suitability.
- Assignment of maintenance responsibility for range improvements as specified in the Rangeland Improvement Policy.
- Providing yearlong habitat for wildlife (big game), recognizing that private and State lands also provide habitat proportional to their productivity.
- Management of four wild horse herd management areas for a total of 850 head in the Salt Wells-Pilot Butte area.
- Continuation of existing stocking rates, season of use, and kind of livestock until monitoring results indicate a change is appropriate.

Map 1-1

GENERAL LOCATION

Salt Wells - Pilot Butte
Grazing Environmental Impact Statement



- Development of four small riparian exclosures.
- Management of eighteen allotments (1,006,929 acres) as improvement allotments. In these allotments the Bureau proposes to:
    - Conduct production inventories on three allotments.
    - Implement 70 water developments.
    - Implement vegetation treatment on 52,973 acres.
    - Develop or continue grazing treatments for all eighteen allotments.
    - Consolidate two of the allotments into one.
    - Construct approximately 160 miles of fence.
- Management of twelve allotments (2,175,353 acres) as maintenance or custodial allotments. In these allotments authorize approved range improvement projects by private individuals or organizations.

Long-Term Environmental Consequences

Under the proposed action, there would be:

- Overall reduction of soil loss, although some areas would continue to lose significant amounts of soil through further gully development.
- Overall improvement of riparian habitat, watershed, and fisheries development.
- Improvement of vegetation productivity and cover, with range in fair and poor condition improving about one-half of an ecological condition class.
- Change from shrub to grass dominance on 52,973 acres scheduled for vegetation treatment. The change would be temporary.
- An additional 12,488 AUMs of livestock forage.
- Reduction of wild horses by 1,466 from the 1983 Wild Horse Census.
- Improvement of wildlife habitat, which would result in opportunity for an estimated 389 additional hunter-days, based on projected big game population increases.
- Continuation of moderate impacts to cultural resources.
- Stable or slightly improved recreation opportunities and overall aesthetics.
- An increase in regional income (all direct and indirect changes) of $507,700 per annum, compared to present.
- An overall positive benefit/cost ratio of 1.447.

CONTINUATION OF THE EXISTING SITUATION (NO ACTION)

Under this alternative the present grazing program would remain intact for the purpose of analyzing the effects of grazing if no changes were initiated. Major components include:

- Continuation of existing AMPs.
- No development of new AMPs.
- No implementation of range projects; e.g., water developments or vegetation treatments.
- Maintenance of existing facilities under the guidelines of the Rangeland Improvement Policy.
- Management of an average of 850 wild horses under the provisions of existing wild horse herd management area plans.
- No dividing or combining of current allotments.

Long-Term Environmental Consequences

Under this alternative there would be:

- Significant increases in soil loss and continued gully headcutting of drainages.
- Continued decrease in riparian habitat, watershed, and fisheries development.
- A decrease in vegetation productivity, with many preferred sites deteriorating from fair to poor condition.
- A loss of 9,180 AUMs of livestock forage.
- Reduction of wild horses would be reduced by 1,466 from the 1983 Wild Horse Census.
- A loss of wildlife habitat, with an associated loss of an estimated 475 hunter-days. (Hunter-day calculations are based on available game.)

- An increase in impacts to cultural resources.
- Stable or declining recreation opportunities.
- A decrease in regional income by $494,700 per annum, compared to present.
- Overall negative (less than one) benefit/cost ratio of 0.888.

EMPHASIZE LIVESTOCK PRODUCTION

Under this alternative management would favor livestock use within the area. This alternative differs from the proposed action in the following ways:

- All future increases in forage would be licensed to livestock operators.
- No riparian exclosures would be developed.
- Eighteen allotments (1,006,929 acres) would be managed as improvement allotments; however, the alternative would entail:
    - Implementing 83 water developments.
    - Implementing vegetation treatment on 84,994 acres.
    - Constructing 162 miles of fence.

Long-Term Environmental Consequences

Under this alternative there would be:

- A slight reduction of overall soil losses. Many areas would continue to be overused. Gully headcutting would continue in many areas.
- Stable or slightly declining riparian habitat, watershed, and fisheries development. Some improvement may be observed in some areas.
- Improvement of vegetation productivity and cover, with range in fair and poor condition improving about one-half of an ecological condition class.
- A change from shrub to grass dominance on 84,994 acres under vegetation treatment.
- An increase of 16,577 AUMs of livestock forage.
- Reduction of wild horses by 1,466 from the 1983 Wild Horse Census.
- Stable or slightly declining wildlife habitat with an estimated loss of 66 hunter-days (based on the availability of big game habitat). Sage grouse habitat would decrease.
- An increase in impacts to cultural resources.
- Stable or slightly decreased recreation opportunities.
- An increase in regional income by $563,700 per annum, compared to present.
- Overall positive benefit/cost ratio of 1.333.

EMPHASIZE WATERSHED, WILDLIFE HABITAT, AND SOIL STABILITY

Under this alternative management would favor soil, water resources, and wildlife. This alternative differs from the proposed action in the following ways:

- Future increases in forage would be utilized for watershed, wildlife, and soil stability. (See Volume 1 for further details.)
- Conversion of kind of livestock would be restricted in 20 allotments.
- Seven small riparian exclosures would be developed.
- Eighteen allotments (1,006,929 acres) would be managed as improvement allotments; however, the alternative would entail:
    - Implementing 32 water developments.
    - Implementing prescribed burns on 38,843 acres.
    - Constructing 160 miles of fence.
- Continuing or developing allotment management plans on all eighteen allotments. AMPs would be designed specifically for enhancement of soils, watershed, and wildlife resources.

Long-Term Environmental Consequences

Under this alternative there would be:

- An overall reduction in soil loss. Only the most preferred grazing sites will be subject to site deterioration.

- An overall improvement of riparian habitat, watershed, and fisheries development.
- Improvement of vegetation productivity and cover, with range in fair and poor condition improving about one-half of an ecological condition class.
- A change from shrub to grass dominance on 38,843 acres of vegetation treatment. The change would be temporary.
- A loss of 151 AUMs of livestock forage.
- A reduction of wild horses by 1,466 from the 1983 Wild Horse Census.
- Significant improvement of wildlife habitat, with an opportunity for an estimated 619 additional hunter-days, based on increased availability of big game.
- Continuation of moderate impacts to cultural resources.
- Improvement of recreational opportunities and overall aesthetics.
- An increase in regional income by $108,200 per annum, compared to present.
- Overall positive benefit/cost ratio of 1.271.

LICENSE NO LIVESTOCK USE ON PUBLIC LANDS

Under this alternative the environment would be allowed to respond to its full potential with a minimum of livestock use. Major components include:

- Allowing operators to run only the currently recognized stocking rate from their unfenced private lands over the entire allotment acreage, provided this land is currently being run in common with the public lands.
- No development of AMPs; existing AMPs would be dropped.
- Allowing conversions in kind of livestock following a favorable analysis of suitability.
- Allowing wildlife to expand to the carrying capacity of their habitat.
- Management of four wild horse herd management areas for a total of 850 head in the grazing management area.

Long-Term Environmental Consequences

In this alternative livestock use is dependent upon the amount of use on private and State lands within a given allotment. As a result the environmental impacts would vary a great deal from allotment to allotment. The following summary must be considered as averages for the entire area:

- There would be an overall stabilization of soils, largely on upland sites, with continued deterioration of many stream bottoms. Gully headcutting would continue in some areas.
- Current trends with respect to riparian habitat, watershed, and fisheries would continue, with significant improvement in localized areas.
- There would be significant improvement in vegetation condition on upland sites.
- There would be a loss of 197,971 AUMs of livestock forage.
- Wild horses would be reduced by 1,466 from the 1983 Wild Horse Census.
- Upland wildlife habitat would improve significantly, resulting in an estimated 9,705 additional hunter-days based on increased availability of big game.
- Impacts to cultural resources would be reduced.
- Recreational opportunity and overall aesthetics would increase.
- Regional income would decrease $6,854,800 per annum, compared to present; regional employment losses would be significant.
- No benefit/cost analysis was performed for this alternative.

SELECTION OF THE PREFERRED ALTERNATIVE

The Bureau has selected the proposed action as the environmentally preferred alternative for the Salt Wells-Pilot Butte grazing management program. In comparing the alternatives (Table 1-1), the proposed action provides sufficient benefits to the livestock industry, as well as benefits to the watershed and wildlife programs, without undue degradation of other resource values.

Table 1-1

COMPARISON OF THE ALTERNATIVES INCLUDING THE PROPOSED ACTION

	Proposed Action	Continuation of the Existing Situation	Emphasize Livestock Production	Emphasize Watershed, Wildlife Habitat, and Soil Stability	License No Livestock Use on Public Lands
Forage Production on Public Lands For Livestock (AUMs)	+ 12,488	- 9,180	+ 6,577	- 151	- 197,971
Proposed Range Improvements					
Water Developments (Number)	70	0	83	32	0
Vegetation Treatments (Acres)	52,973	0	84,994	38,843	0
New Fencing (Miles)	160	0	162	160	0
Benefit/Cost Ratio	1.447	0.888	1.333	1.271	NA
Long-Term Effects					
Soil Erosion Rates	Reduction	Increase	Slight Increase	Reduction	Slight Reduction
Sediment Rates	20% Reduction	10% Increase	15% Reduction	30% Reduction	18% Reduction
Aquatic Habitat	Improvement Overall	Continued Degradation	Stable to Slight Decrease	Improvement Overall	Improvement in Localized Areas
Big Game Numbers					
Antelope	+ 409	- 259	- 233	+ 744	+ 15,967
Deer	+ 382	- 493	- 3	+ 571	+ 6,504
Elk	+ 41	- 67	- 4	+ 64	+ 1,109
Adverse Effects on Cultural Resources	Continued Moderate	Increased	Increased	Continued Moderate	Decreased
Recreation Resources Hunter-Days	+ 389	- 475	- 66	+ 619	+ 9,705
Regional Income (in Dollars Per Annum Compared to Present)	+ 507,700	- 494,700	+ 563,700	+ 108,200	- 6,854,800
Employment Opportunities	+ 6	- 7	+ 6	+ 3	- 53

SECTION 2

REVISIONS OF VOLUME 1

The following revisions to Volume 1 of this environmental impact statement (EIS) have been made on the basis of public comment and further Bureau review of the draft EIS. The reader should refer to the page, column, paragraph, and lines in Volume 1 as specified for each revision in this section.

Page 7, right column, paragraph 1, first sentence is revised to read:

During the development of the alternatives and categorization of the allotment, all the livestock operators with grazing permits in the area were contacted.

Page 9, left column, paragraph 3, lines 15-19, sentence is revised to read:

..."I" allotment categorization would usually involve the development of an AMP in which water developments, vegetation treatments, and grazing are coordinated into a cohesive, site-specific allotment management plan.

Page 15, right column, item 2b, first sentence is revised to read:

b. Implement monitoring studies...to an intensity necessary to detect changes in resource conditions.

Page 17, left column, paragraph 9, item 4a, is revised to read:

a. Assign livestock operators with intermingled private land a permit in which the federal AUMs are expressed as a percentage of the total allotment. Negotiate exchange of use agreements when special circumstances warrant use of such an arrangement.

Page 19, Map 1-3 is amended by extending the boundary of the Salt Wells Wild Horse Herd Management Area to the western rim of the plateau upon which Highway 191 is located between Little Bitter Creek and Sage Creek, thus including the entire top of the plateau within the herd management area.

Page 31, left column, item 5, is revised to read:

Wildlife herd levels would be allowed to expand to the limit of the habitat's potential grazing capacity, within the framework of the Wyoming Game and Fish Department management plans.

Page 33, left column, paragraph 3, lines 15-18, is revised to read:

...This problem would become more acute as demand for forestry products increases. (See Errata Sheet for correction to remainder of this paragraph.)

Page 36, left column, insert after paragraph 3:

The State of Wyoming reserves the right in its grazing leases to allow the public to hunt or fish on State lands, except where not allowed as specifically posted by the Commissioner of Public Lands. In cases where vehicular access is not allowed, hunters and fishermen may enter the State lands on foot or on horseback.

Page 73, left column, paragraph 2, sentence in line 6 beginning with "In addition less..." is deleted.

Page 80, left column, paragraph 1, lines 11-14, sentence is revised to read:

The Steamboat/Sand Dunes herd...has declined to fewer than 500 animals in recent years.

Page 93, Map 2-7 is amended by adding the Mormon and Oregon trails to the northwest corner of the area. Both trails cross the Green River in the vicinity of its confluence with the Big Sandy River.

Page 111, left column, second item under Proposed Action is revised to read:

There would be continued moderate degradation of some unfenced riparian habitat.

Page 116, Table 3-1, second column, Mary J. Hanson also wrote those portions of the draft EIS that pertain to wilderness and recreation resources.

Page 119, the fish species in Table 2-1 are added to the Animal section of Appendix A.

Page 146, Figure E-2 of Appendix E is amended by the following footnote:

In wild horse management areas, a length of rebar would be welded between the cattleguard bars to prevent wild horses from injuring themselves.

REVISIONS OF VOLUME 1

Page 168, left column, second paragraph should read:

GRAZING PREFERENCE. The total number of animal unit months (AUMs) of livestock grazing on public lands apportioned and attached to base property owned or controlled by a permittee or lessee.

Table 2-1

FISH SPECIES IN SALT WELLS-PILOT BUTTE AREA

Common Name	Scientific Name
Bluehead sucker	*Pantosteus discobolus*
Brook trout	*Salvelinus fontinalis*
Brown trout	*Salmo trutta*
Carp	*Cyprinus carpio*
Cutthroat trout	*Salmo clarki*
Fathead minnow	*Pimephales promelas*
Flannelmouth sucker	*Catostomus latipinnis*
Longnose dace	*Rhinichthys cataractae*
Mottled sculpin	*Cottus bairdi*
Mountain sucker	*Pantostetus plantyrhynchus*
Rainbow trout	*Salmo gairdneri*
Redside shiner	*Richardsonius balteatus*
Roundtail chub	*Gila robusta*
Speckled dace	*Rhinichthys osculus*
Utah chub	*Gila atraria*
White sucker	*Catostomus commersoni*

SECTION 3

CONSULTATION AND COORDINATION

TEAM ORGANIZATION

This environmental impact statement (EIS) was prepared by an interdisciplinary team of resource specialists in the Rock Springs District Office and the Salt Wells and Big Sandy resource area offices. The Team Leader and Core Team were primarily responsible for revising and organizing the EIS, in addition to other assigned sections. Table 3-1, page 116 of Volume 1, lists the preparers of this EIS.

COORDINATION IN PREPARATION OF THE PROPOSED ACTION AND ALTERNATIVES

Draft range management recommendations for the area were developed in 1980 and 1981 through the BLM planning process by the Big Sandy and Salt Wells resource area staffs. The public was consulted throughout the process.

In July 1981, letters were sent to various agencies, organizations, and individuals, announcing the Bureau's new rangeland management policy; the policy includes a requirement that grazing allotments be grouped into management categories. During July and August 1981, the BLM discussed the classification system and management categories with various groups; included were the Western Wyoming Livestock Users Association and the Rock Springs Grazing Association boards of directors, the BLM Grazing Advisory Board, and the BLM Multiple Use Advisory Council. BLM Salt Wells range staff members also met with most of the area's livestock operators on a personal basis to solicit their comments on the system. Final categorization criteria were sent to the public in January 1982, and the operators were sent a letter in July 1982 that explained the proposed action and alternatives.

The proposed land use decisions for range management were presented during the public scoping meeting July 29, 1982. The scoping meeting was announced in a news release to media in the Rock Springs District. In September 1982, another letter was sent to the public to remind interested agencies, organizations, and individuals of the EIS and to outline the proposed action and alternatives. Subsequent meetings were held in November and December 1982 with the Western Wyoming Livestock Users Association, Inc.; Old West Regional Commission; and Wyoming Game and Fish Department to discuss various aspects of the proposed action.

PUBLIC CONSULTATION AND COORDINATION

In addition to the public scoping meetings (see Chapter 1 of Volume 1 for details), the Bureau has consulted with various individuals and agencies with expertise on specific aspects of this EIS. Rock Springs banking interests (Northside State Bank, Rock Springs National Bank, and First Wyoming Bank of Rock Springs) wereconsulted concerning the Bureau's economic profiles for typical livestock operations. Also consulted concerning the Bureau's economic profiles were the Federal Land Bank, Production Credit Association; Economic Research Service, U.S. Department of Agriculture; economics and animal science departments, Colorado State University and the University of Wyoming; Sweetwater County Extension Agent; and Sweetwater County Tax Assessor. The Wyoming Game and Fish Department was consulted concerning wildlife populations in the area. Seedskadee Wildlife Refuge and Flaming Gorge National Recreation Area staff members were consulted concerning range management actions within those areas, and wild horse organizations were consulted on wild horse proposals for the area.

REVIEW OF THE DRAFT EIS

A public review period was scheduled to provide the public an opportunity to review the draft environmental impact statement (Volume 1 of this EIS) and then offer comments on the proposed range management program, alternatives to that program, and the adequacy of the impact analysis presented in the draft EIS.

The draft EIS was issued on May 31, 1983. The Notice of Availability was published on May 31, 1983, in the ***Federal Register***. The notice also announced a public review period ending July 31, 1983, and included an announcement of formal public hearing on the draft EIS to be held in Rock Springs, Wyoming. Copies of the draft EIS were mailed to more than 100 Federal, State, and local government agencies and nongovernment organizations and individuals such as area livestock operators and conservation groups for their review and comments (see Chapter 4 and Appendix B, Volume 1). Copies of the draft EIS are available upon request, and public review copies are available in area public libraries and BLM offices.

In addition to the ***Federal Register*** notice, the availability of the draft EIS was announced in a June 1983 Rock Springs District Office news release to media throughout the area.

Public Hearing

A formal public hearing was conducted by the Bureau of Land Management at 7 p.m., July 13, 1983, in Western Wyoming College, Rock Springs. Oral testimony on the behalf of the International Society for the Protection of Mustangs and Burros and the Sweetwater County Wildlife Association was received. The hearing was conducted by the Rock Springs District Manager, and oral comments were recorded verbatim by a Court Recorder. The Hearings Panel consisted of the Big Sandy Resource Area Manager, Salt Wells Resource Area Manager, EIS Team leader, and resource specialists from the Big Sandy area and the Rock Springs District Office. Copies of the full transcript are available for public review in the Big Sandy and Salt Wells Resource Area offices, Gateway Building, 79 Winston Drive, Rock Springs, Wyoming.

Handling and Review Procedures for Public Comments

During the review process, 20 letters were received from Federal and State agencies; private organizations such as environmental groups and oil and gas development interests; and individuals such as area livestock operators. A complete listing of those commenting on the draft EIS is shown in Table 3-2.

All letters and testimony were reviewed and considered in the preparation of the final EIS. Substantive comments, i.e., those which presented pertinent new information, questioned the impact analyses or data, or raised issues bearing directly upon the implementation of the proposed action or its alternative, were addressed separately. Responses to those comments appear beside the copies of the respective letters in the following section.

Table 3-2
LIST OF COMMENTATORS ON DEIS

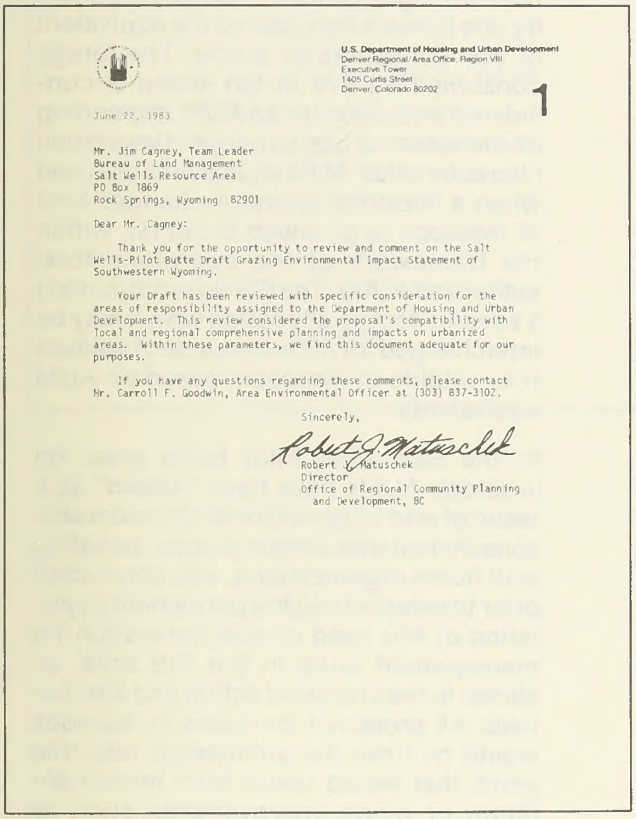
Index Number/Name	City	Representing
1. Robert J. Matuschek	Denver, CO	U.S. Department of Housing and Urban Development, RegionVIII
2. Jeannine R. Stallings	Cheyenne, WY	Wyoming Advocates for Animals and International Society for the Protection of Mustangs and Burros
3. John C. Borzea[1]	Rock Springs, WY	International Society for the Protection of Mustangs and Burros
4. Wendy H. Frueauf	Casper, WY	Petroleum Association of Wyoming
5. Richard A. Strait	Denver, CO	National Park Service, Rocky Mountain Regional Office
6. Arthur Anderson	Cheyenne, WY	U.S. Fish and Wildlife Service
7. Daniel A. Poole	Washington, D.C.	Wildlife Management Institute
8. James M. Borzea[1]	Rock Springs, WY	Sweetwater County Wildlife Association
9. Lenny Kiehm	Rock Springs, WY	Sweetwater County Wildlife Association
10. Governor Ed Herschler	Cheyenne, WY	State of Wyoming
11. William P. King	Cheyenne, WY	Wyoming State Highway Department
12. Louis E. Allen	Cheyenne, WY	Wyoming State Engineer's Office
13. Gary B. Glass and James C. Case	Laramie, WY	Geological Survey of Wyoming
14. Dick Randall	Rock Springs, WY	Defenders of Wildlife
15. John G. Welles	Denver, CO	Environmental Protection Agency
16. Tom Dougherty	Cheyenne, WY	Wyoming Wildlife Federation
17. Dick Loper	Lander, WY	Wyoming State Grazing Board
18. W. Donald Dexter	Cheyenne, WY	Wyoming Game and Fish Department
19. George C. Weddell	Sacramento, CA	Corps of Engineers
20. Craig D. Thompson	Rock Springs, WY	Self

[1]Also presented testimony at public hearing. Comments in letters are similar to those given at hearing.

SECTION 4

LETTERS AND RESPONSES TO COMMENTS

Each letter received is presented in full with a response, where appropriate, following each letter. Each comment and response has been numbered.



U.S. Department of Housing and Urban Development
Denver Regional Area Office, Region VIII
Executive Tower
1405 Curtis Street
Denver, Colorado 80202

1

June 22, 1983

Mr. Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
PO Box 1869
Rock Springs, Wyoming 82901

Dear Mr. Cagney:

Thank you for the opportunity to review and comment on the Salt Wells-Pilot Butte Draft Grazing Environmental Impact Statement of Southwestern Wyoming.

Your Draft has been reviewed with specific consideration for the areas of responsibility assigned to the Department of Housing and Urban Development. This review considered the proposal's compatibility with local and regional comprehensive planning and impacts on urbanized areas. Within these parameters, we find this document adequate for our purposes.

If you have any questions regarding these comments, please contact Mr. Carroll F. Goodwin, Area Environmental Officer at (303) 837-3102.

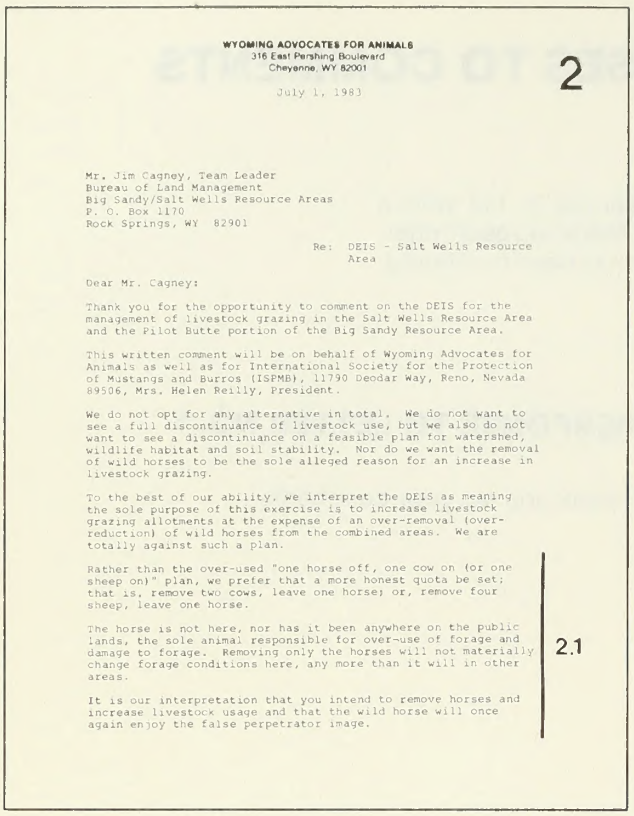
Sincerely,

Robert J. Matuschek

Robert J. Matuschek
Director
Office of Regional Community Planning
and Development, 8C

RESPONSE TO LETTER NO. 1

Thank you for your comments.



WYOMING ADVOCATES FOR ANIMALS
316 East Pershing Boulevard
Cheyenne, WY 82001

2

July 1, 1983

Mr. Jim Cagney, Team Leader
Bureau of Land Management
Big Sandy/Salt Wells Resource Areas
P. O. Box 1170
Rock Springs, WY 82901

Re: DEIS - Salt Wells Resource Area

Dear Mr. Cagney:

Thank you for the opportunity to comment on the DEIS for the management of livestock grazing in the Salt Wells Resource Area and the Pilot Butte portion of the Big Sandy Resource Area.

This written comment will be on behalf of Wyoming Advocates for Animals as well as for International Society for the Protection of Mustangs and Burros (ISPMB), 11790 Deodar Way, Reno, Nevada 89506, Mrs. Helen Reilly, President.

We do not opt for any alternative in total. We do not want to see a full discontinuance of livestock use, but we also do not want to see a discontinuance on a feasible plan for watershed, wildlife habitat and soil stability. Nor do we want the removal of wild horses to be the sole alleged reason for an increase in livestock grazing.

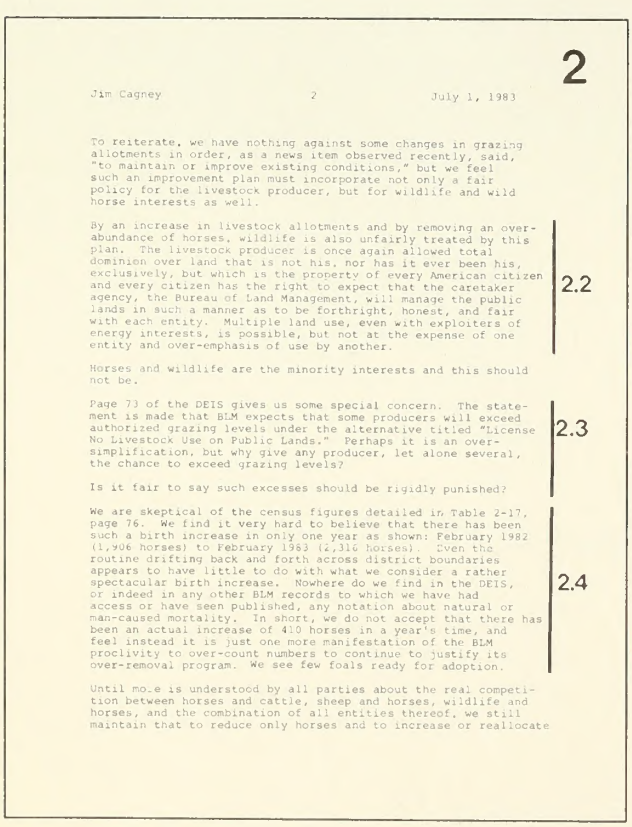
To the best of our ability, we interpret the DEIS as meaning the sole purpose of this exercise is to increase livestock grazing allotments at the expense of an over-removal (over-reduction) of wild horses from the combined areas. We are totally against such a plan.

Rather than the over-used "one horse off, one cow on (or one sheep on)" plan, we prefer that a more honest quota be set; that is, remove two cows, leave one horse; or, remove four sheep, leave one horse.

The horse is not here, nor has it been anywhere on the public lands, the sole animal responsible for over-use of forage and damage to forage. Removing only the horses will not materially change forage conditions here, any more than it will in other areas.

It is our interpretation that you intend to remove horses and increase livestock usage and that the wild horse will once again enjoy the false perpetrator image.

2.1



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Jim Cagney 2 July 1, 1983

To reiterate, we have nothing against some changes in grazing allotments in order, as a news item observed recently, said, "to maintain or improve existing conditions," but we feel such an improvement plan must incorporate not only a fair policy for the livestock producer, but for wildlife and wild horse interests as well.

By an increase in livestock allotments and by removing an over-abundance of horses, wildlife is also unfairly treated by this plan. The livestock producer is once again allowed total dominion over land that is not his, nor has it ever been his, exclusively, but which is the property of every American citizen and every citizen has the right to expect that the caretaker agency, the Bureau of Land Management, will manage the public lands in such a manner as to be forthright, honest, and fair with each entity. Multiple land use, even with exploiters of energy interests, is possible, but not at the expense of one entity and over-emphasis of use by another.

2.2

Horses and wildlife are the minority interests and this should not be.

Page 73 of the DEIS gives us some special concern. The statement is made that BLM expects that some producers will exceed authorized grazing levels under the alternative titled "License No Livestock Use on Public Lands." Perhaps it is an over-simplification, but why give any producer, let alone several, the chance to exceed grazing levels?

2.3

Is it fair to say such excesses should be rigidly punished?

We are skeptical of the census figures detailed in Table 2-17, page 76. We find it very hard to believe that there has been such a birth increase in only one year as shown: February 1982 (1,906 horses) to February 1983 (2,316 horses). Even the routine drifting back and forth across district boundaries appears to have little to do with what we consider a rather spectacular birth increase. Nowhere do we find in the DEIS, or indeed in any other BLM records to which we have had access or have seen published, any notation about natural or man-caused mortality. In short, we do not accept that there has been an actual increase of 410 horses in a year's time, and feel instead it is just one more manifestation of the BLM proclivity to over-count numbers to continue to justify its over-removal program. We see few foals ready for adoption.

2.4

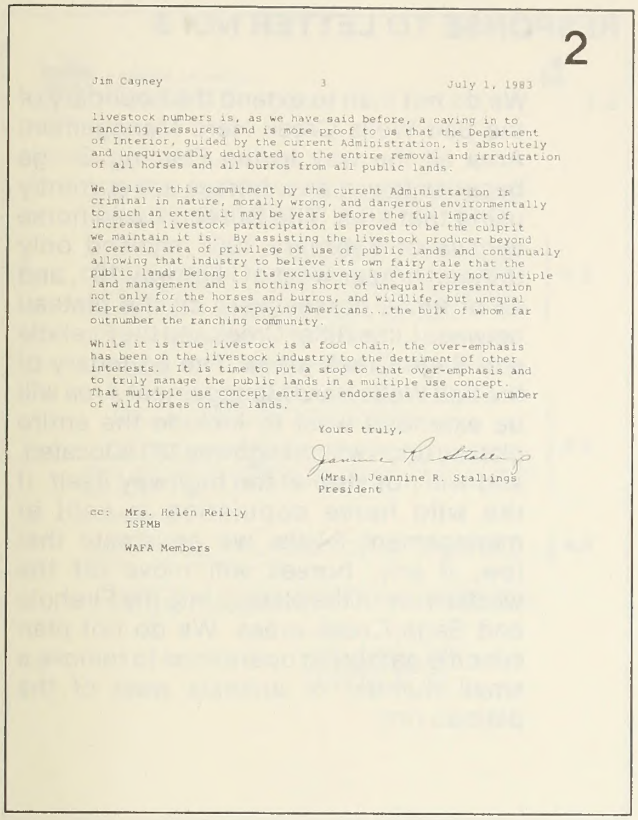
Until more is understood by all parties about the real competition between horses and cattle, sheep and horses, wildlife and horses, and the combination of all entities thereof, we still maintain that to reduce only horses and to increase or reallocate

RESPONSES TO LETTER NO. 2

2.1 The basic unit of grazing is the Animal Unit Month (AUM), which is the amount of forage consumed by one cow-calf unit or its equivalent for a one-month duration. Please refer to the Glossary, page 167 of Volume 1, for equivalent values for other species. Equivalents for other species are often a matter of great debate when all factors, such as body weight and diet overlap, are considered. Generally in the Rock Springs District, the forage consumed by one horse is considered the equivalent of that consumed by a cow. The forage consumed by five to ten sheep is considered equivalent to an AUM, depending on the season of use, terrain, and vegetation characteristics. AUM equivalents are used when a livestock operator changes kind of livestock (e.g., sheep to cattle), within the framework of the operator's total authorized AUMs. The EIS does not contain a specific forage allocation which may be interchanged for different kinds of animals (i.e., wildlife or livestock) based on AUM equivalents.

In the Salt Wells-Pilot Butte area, no livestock AUMs have been "added" as a result of wild horse removal. Considerable consultation with various groups, including wild horse organizations, was conducted prior to establishing the permanent population of 850 head of wild horses for the management units in the EIS area, as shown in the proposed action and alternatives. All projected increases in livestock would be from the anticipated resource gains that would result from implementation of range improvements such as prescribed burns, water developments, and deferred grazing. Please refer to Appendix D of Volume 1 for the methodology used in projecting changes in AUMs.

2.2 A large number of the horses in the Salt Wells-Pilot Butte area currently utilize forage produced on private lands, especially the checkerboard lands. As noted above (2.1), management levels were established. The Bureau currently is operating under a court order to reduce wild horse numbers to those levels. The livestock operators, particularly those in the Rock Springs Allotment, have voluntarily agreed to allow some wild horse use on their lands; were it not for these cooperative agreements, horses would be totally removed from such ranges. Removal of



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Jim Cagney 3 July 1, 1983

livestock numbers is, as we have said before, a caving in to ranching pressures, and is more proof to us that the Department of Interior, guided by the current Administration, is absolutely and unequivocably dedicated to the entire removal and irradication of all horses and all burros from all public lands.

We believe this commitment by the current Administration is criminal in nature, morally wrong, and dangerous environmentally to such an extent it may be years before the full impact of increased livestock participation is proved to be the culprit we maintain it is. By assisting the livestock producer beyond a certain area of privilege of use of public lands and continually allowing that industry to believe its own fairy tale that the public lands belong to its exclusively is definitely not multiple land management and is nothing short of unequal representation not only for the horses and burros, and wildlife, but unequal representation for tax-paying Americans...the bulk of whom far outnumber the ranching community.

While it is true livestock is a food chain, the over-emphasis has been on the livestock industry to the detriment of other interests. It is time to put a stop to that over-emphasis and to truly manage the public lands in a multiple use concept. That multiple use concept entirely endorses a reasonable number of wild horses on the lands.

Yours truly,

(Mrs.) Jeannine R. Stallings
President

cc: Mrs. Helen Reilly
ISPMB

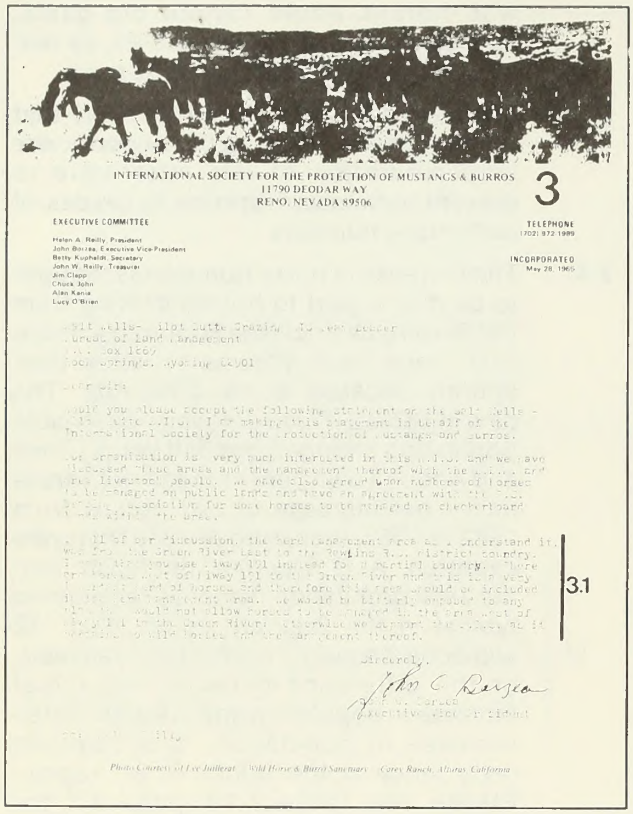
WAFA Members

wild horses would benefit big game, especially antelope, deer, and elk, as well as other game and nongame species.

2.3 The paragraph was intended to say that range supervision would be needed under implementation of this alternative to **prevent** anticipated grazing in excess of authorized numbers.

2.4 The increase in horse numbers is thought to be due in part to horses drifting from the Rawlins District (see Footnote 4, Table 2-17, page 76 of Volume 1) rather than entirely because of the birth rate. The data in Table 2-17 indicate very reasonable population changes; the Salt Wells Creek and Adobe Town herd management areas had a net increase of 542 horses from 1982 to 1983, including the 200 that were captured. A 17.5 percent increase from the 1982 population (which is considered typical in the District) would yield 172 additional animals. The drift of 370 animals, or the difference between the actual increase in population and the anticipated increase in population, is a common occurrence in the Adobe Town region. Please see Table 2-19, page 77, for documentation of the number of foals captured, which could be an indication of how many may be available for adoption in any given year.

The Bureau would never, under any circumstances, deliberately misrepresent its wild horse census numbers. We feel that our data are collected with the best available methodology, and we are confident of its accuracy.



INTERNATIONAL SOCIETY FOR THE PROTECTION OF MUSTANGS & BURROS
11790 DEODAR WAY
RENO, NEVADA 89506

3

EXECUTIVE COMMITTEE

Helen A. Reilly, President
John Bonsea, Executive Vice-President
Betty Kuphaldt, Secretary
John W. Reilly, Treasurer
Jim Clapp
Chuck John
Allen Kania
Lucy O'Brien

TELEPHONE
(702) 972-1989

INCORPORATED
May 28, 1965

Salt Wells- Pilot Butte Grazing Allotment
Bureau of Land Management
P.O. Box 1869
Rock Springs, Wyoming 82901

Dear Sirs:

Would you please accept the following statement on the Salt Wells - Pilot Butte Area. I am making this statement in behalf of the International Society for the Protection of Mustangs and Burros.

Our organization is very much interested in this matter and we have discussed this area and the management thereof with the Bureau and the livestock people. We have also agreed upon numbers of horses to be managed on public lands and have an agreement with the [illegible] Specifically, according to those horses to be managed or checkerboard [illegible] this area.

All of our discussion, the herd management area as I understand it would be from the Green River east to the Bowling [illegible] district country. I think that you use Highway 191 instead for a natural boundary. More specifically, out of Highway 191 to the Green River and this is a very important area of horses and therefore this area would be included in the herd management area. We would be bitterly opposed to any plan that would not allow horses to be managed in the area west of Highway 191 to the Green River. Otherwise we support the [illegible] to allow horses and the management thereof.

3.1

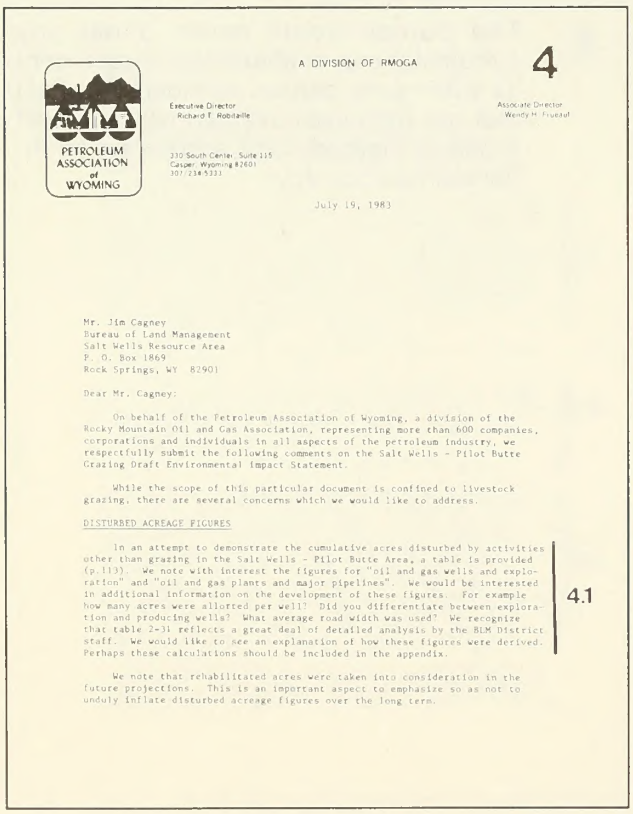
Sincerely,

John C. Bonsea
Executive Vice President

Photos Courtesy of Eve Juillerat - Wild Horse & Burro Sanctuary - Carey Ranch, Alturas, California

RESPONSE TO LETTER NO. 3

3.1 We do not plan to extend the boundary of the Salt Wells Creek Herd Management Area all the way to the Flaming Gorge because few, if any, horses are currently using that area. The Bureau's wild horse census of February 1983 showed only thirteen horses west of Highway 191, and all of those horses were on the plateau between Little Bitter Creek and the Firehole and Sage Creek areas. The boundary of the Salt Wells Herd Management Area will be extended west to include the entire plateau upon which Highway 191 is located, and will not stop at the highway itself. If the wild horse population is kept at management levels, we anticipate that few, if any, horses will move off the western rim of the plateau into the Firehole and Sage Creek areas. We do not plan specific gathering operations to remove a small number of animals west of the plateau rim.



PETROLEUM ASSOCIATION of WYOMING

A DIVISION OF RMOGA

4

Executive Director
Richard F. Robitaille

Associate Director
Wendy H. Fruetel

330 South Center, Suite 115
Casper, Wyoming 82601
307/234-5333

July 19, 1983

Mr. Jim Cagney
Bureau of Land Management
Salt Wells Resource Area
P. O. Box 1869
Rock Springs, WY 82901

Dear Mr. Cagney:

On behalf of the Petroleum Association of Wyoming, a division of the Rocky Mountain Oil and Gas Association, representing more than 600 companies, corporations and individuals in all aspects of the petroleum industry, we respectfully submit the following comments on the Salt Wells - Pilot Butte Grazing Draft Environmental Impact Statement.

While the scope of this particular document is confined to livestock grazing, there are several concerns which we would like to address.

DISTURBED ACREAGE FIGURES

In an attempt to demonstrate the cumulative acres disturbed by activities other than grazing in the Salt Wells - Pilot Butte Area, a table is provided (p.113). We note with interest the figures for "oil and gas wells and exploration" and "oil and gas plants and major pipelines". We would be interested in additional information on the development of these figures. For example how many acres were allotted per well? Did you differentiate between exploration and producing wells? What average road width was used? We recognize that table 2-31 reflects a great deal of detailed analysis by the BLM District staff. We would like to see an explanation of how these figures were derived. Perhaps these calculations should be included in the appendix.

4.1

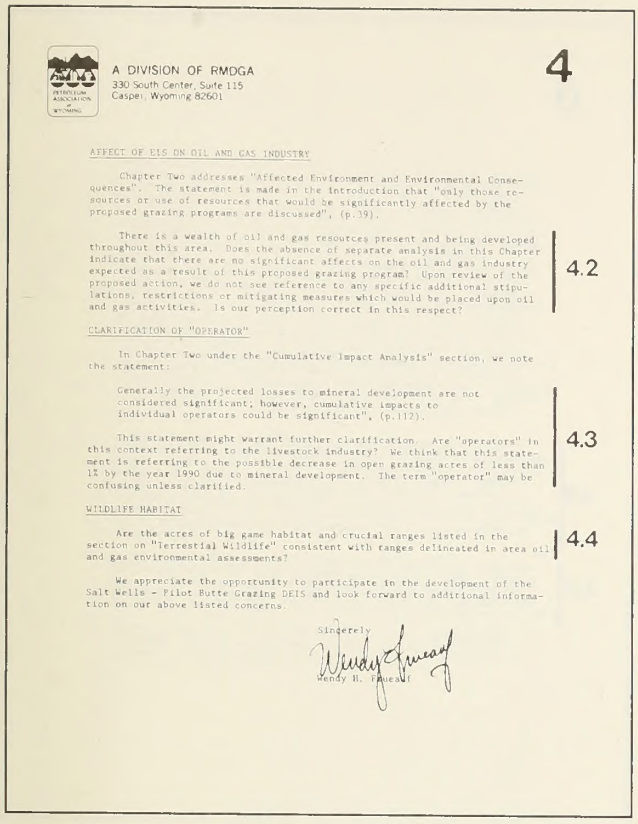
We note that rehabilitated acres were taken into consideration in the future projections. This is an important aspect to emphasize so as not to unduly inflate disturbed acreage figures over the long term.

RESPONSES TO LETTER NO. 4

4.1 Please refer to Footnote 3, Table 2-31, page 113. The Big Sandy/Salt Wells Oil and Gas Draft Environmental Assessment (BLM, Rock Springs District, 1981) contains complete information concerning acres disturbed per producing and exploration well, roads, and other facilities. Tables II-1, II-2, and II-3 of that EA provide the bases for the cumulative analysis in this document. The information presented in this EIS has been updated, but the same calculations and methodology as the oil and gas EA were utilized.

4.2 Your perception is correct.

4.3 "Operators" as used in this EIS refers to an individual rancher or livestock organization. The total forage losses from mineral development are considered insignificant to the area's entire livestock industry, but some individual operations could be severely impacted. For example, the proposed Beans Spring coal project and Pio coal tract, if developed, would have a large impact on the Salt Wells Livestock operations (see pages 33-34 of Volume 1).



A DIVISION OF RMOGA
330 South Center, Suite 115
Casper, Wyoming 82601

4

AFFECT OF EIS ON OIL AND GAS INDUSTRY

Chapter Two addresses "Affected Environment and Environmental Consequences". The statement is made in the introduction that "only those resources or use of resources that would be significantly affected by the proposed grazing programs are discussed", (p.39).

There is a wealth of oil and gas resources present and being developed throughout this area. Does the absence of separate analysis in this Chapter indicate that there are no significant affects on the oil and gas industry expected as a result of this proposed grazing program? Upon review of the proposed action, we do not see reference to any specific additional stipulations, restrictions or mitigating measures which would be placed upon oil and gas activities. Is our perception correct in this respect? 4.2

CLARIFICATION OF "OPERATOR"

In Chapter Two under the "Cumulative Impact Analysis" section, we note the statement:

> Generally the projected losses to mineral development are not considered significant; however, cumulative impacts to individual operators could be significant", (p.112).

This statement might warrant further clarification. Are "operators" in this context referring to the livestock industry? We think that this statement is referring to the possible decrease in open grazing acres of less than 1% by the year 1990 due to mineral development. The term "operator" may be confusing unless clarified. 4.3

WILDLIFE HABITAT

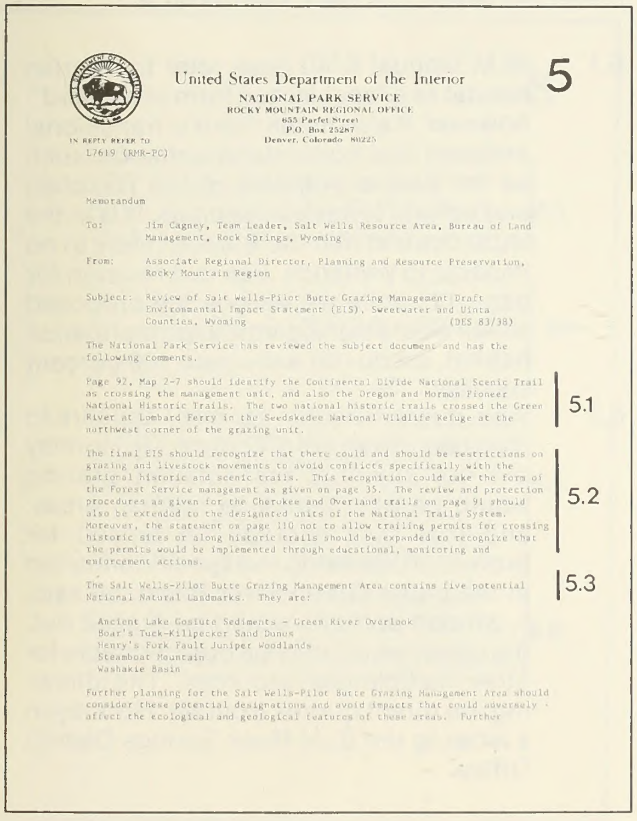
Are the acres of big game habitat and crucial ranges listed in the section on "Terrestial Wildlife" consistent with ranges delineated in area oil and gas environmental assessments? 4.4

We appreciate the opportunity to participate in the development of the Salt Wells - Pilot Butte Grazing DEIS and look forward to additional information on our above listed concerns.

Sincerely,

Wendy H. Fauerbach

4.4 The acres of big game habitat and crucial ranges delineated in this EIS have been updated on the basis of the most recent Wyoming Game and Fish Department and BLM data.



United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

5

IN REPLY REFER TO:
L7619 (RMR-PC)

Memorandum

To: Jim Cagney, Team Leader, Salt Wells Resource Area, Bureau of Land Management, Rock Springs, Wyoming

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Salt Wells-Pilot Butte Grazing Management Draft Environmental Impact Statement (EIS), Sweetwater and Uinta Counties, Wyoming (DES 83/38)

The National Park Service has reviewed the subject document and has the following comments.

Page 92, Map 2-7 should identify the Continental Divide National Scenic Trail as crossing the management unit, and also the Oregon and Mormon Pioneer National Historic Trails. The two national historic trails crossed the Green River at Loebard Ferry in the Seedskedee National Wildlife Refuge at the northwest corner of the grazing unit. 5.1

The final EIS should recognize that there could and should be restrictions on grazing and livestock movements to avoid conflicts specifically with the national historic and scenic trails. This recognition could take the form of the Forest Service management as given on page 35. The review and protection procedures as given for the Cherokee and Overland trails on page 91 should also be extended to the designated units of the National Trails System. Moreover, the statement on page 110 not to allow trailing permits for crossing historic sites or along historic trails should be expanded to recognize that the permits would be implemented through educational, monitoring and enforcement actions. 5.2

The Salt Wells-Pilot Butte Grazing Management Area contains five potential National Natural Landmarks. They are: 5.3

Ancient Lake Gosiute Sediments - Green River Overlook
Boar's Tusk-Killpecker Sand Dunes
Henry's Fork Fault Juniper Woodlands
Steamboat Mountain
Washakie Basin

Further planning for the Salt Wells-Pilot Butte Grazing Management Area should consider these potential designations and avoid impacts that could adversely affect the ecological and geological features of these areas. Further

RESPONSES TO LETTER NO. 5

5.1 The Oregon and Pioneer trails will be added to the Bureau's management data base for the area. The Continental Divide National Scenic Trail does not cross the area; the route is north of the management units discussed in this EIS. Please see Revisions section; Map 2-7 has been revised.

5.2 Protection of historic trails has been considered. The Bureau is not proposing any undertaking that would tend to concentrate livestock use or trailing along historic trails. The Bureau believes these are the only type of actions that would affect the trails.

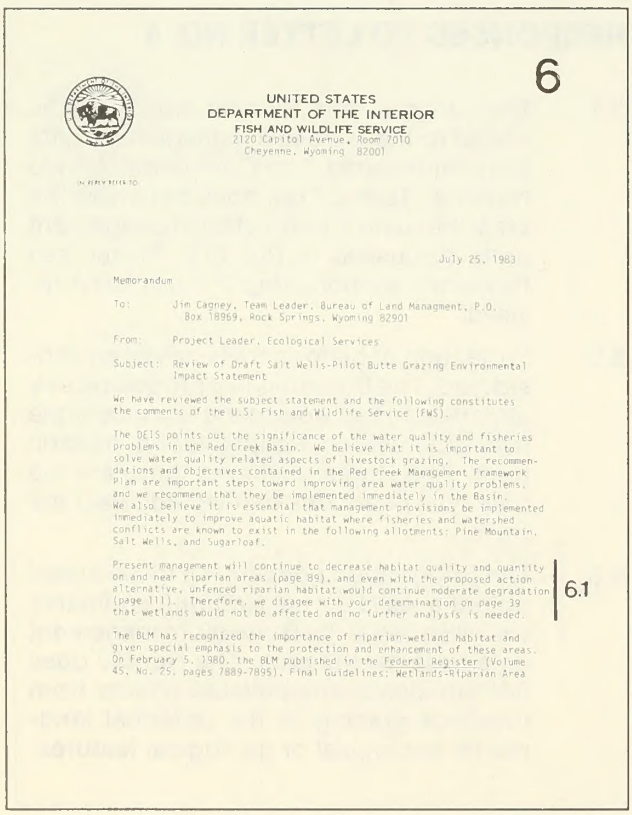
5.3 The information concerning these areas' potential as National Natural Landmarks will be added to the Bureau's management data base for the area. The Bureau does not anticipate any adverse effects from livestock grazing to the potential landmarks' ecological or geological features.

5

Information can be obtained from Ms. Carole Madison, National Park Service, Rocky Mountain Regional Office, Division of Recreation Grants and Review, P.O. Box 25287, Denver, Colorado 80225 (Phone: 234-6443).

for Richard A. Strait

Katherine Cole



6

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
2120 Capitol Avenue, Room 7010
Cheyenne, Wyoming 82001

IN REPLY REFER TO:

July 25, 1983

Memorandum

To: Jim Cagney, Team Leader, Bureau of Land Managment, P.O. Box 18969, Rock Springs, Wyoming 82901

From: Project Leader, Ecological Services

Subject: Review of Draft Salt Wells-Pilot Butte Grazing Environmental Impact Statement

We have reviewed the subject statement and the following constitutes the comments of the U.S. Fish and Wildlife Service (FWS).

The DEIS points out the significance of the water quality and fisheries problems in the Red Creek Basin. We believe that it is important to solve water quality related aspects of livestock grazing. The recommendations and objectives contained in the Red Creek Management Framework Plan are important steps toward improving area water quality problems, and we recommend that they be implemented immediately in the Basin. We also believe it is essential that management provisions be implemented immediately to improve aquatic habitat where fisheries and watershed conflicts are known to exist in the following allotments: Pine Mountain, Salt Wells, and Sugarloaf.

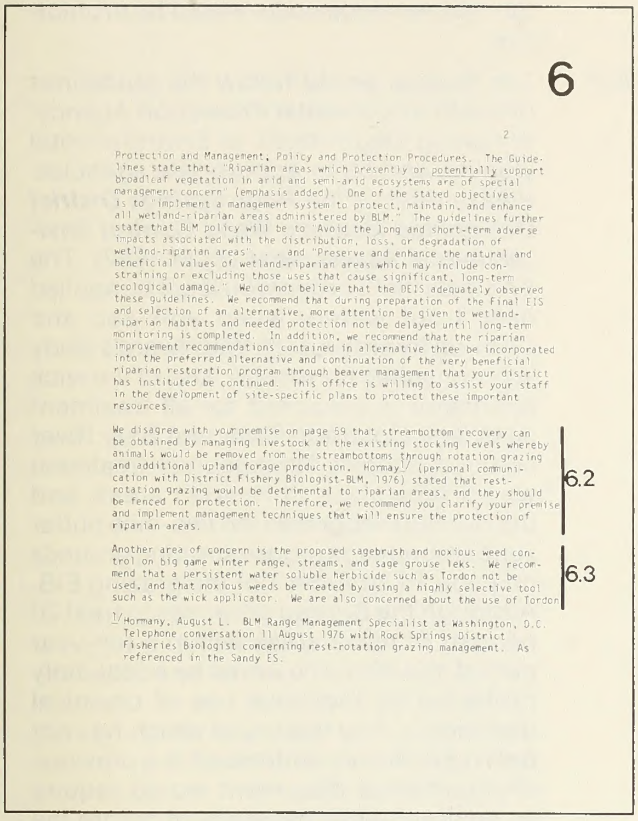
Present management will continue to decrease habitat quality and quantity on and near riparian areas (page 89), and even with the proposed action alternative, unfenced riparian habitat would continue moderate degradation (page 111). Therefore, we disagee with your determination on page 39 that wetlands would not be affected and no further analysis is needed. 6.1

The BLM has recognized the importance of riparian-wetland habitat and given special emphasis to the protection and enhancement of these areas. On February 5, 1980, the BLM published in the Federal Register (Volume 45, No. 25, pages 7889-7895), Final Guidelines: Wetlands-Riparian Area

RESPONSES TO LETTER NO. 6

6.1 BLM Manual 6740 does refer to riparian habitat as a "specialized form of wetland"; however, it also notes that it is transitional between true bottomland wetlands (such as the prairie potholes of the Dakotas) and upland terrestrial habitats. It is in the latter context that the Bureau refers to no impacts to wetlands. See text revision for page 11; while we believe the proposed action would significantly improve riparian habitat, we do not anticipate 100 percent success.

6.2 Your quote from Mr. Hormay appears to have been taken out of context. Mr. Hormay did not say that rest-rotation grazing would be detrimental to riparian areas, and that they should be fenced for protection. Refering to a specific situation in the upper Green River Basin, he said, "...stream bottoms would be grazed out, the use of which may be objectionable for other multiple-use resources." The following are direct quotes from Mr. Hormay in a letter to the BLM Rock Springs District Office.



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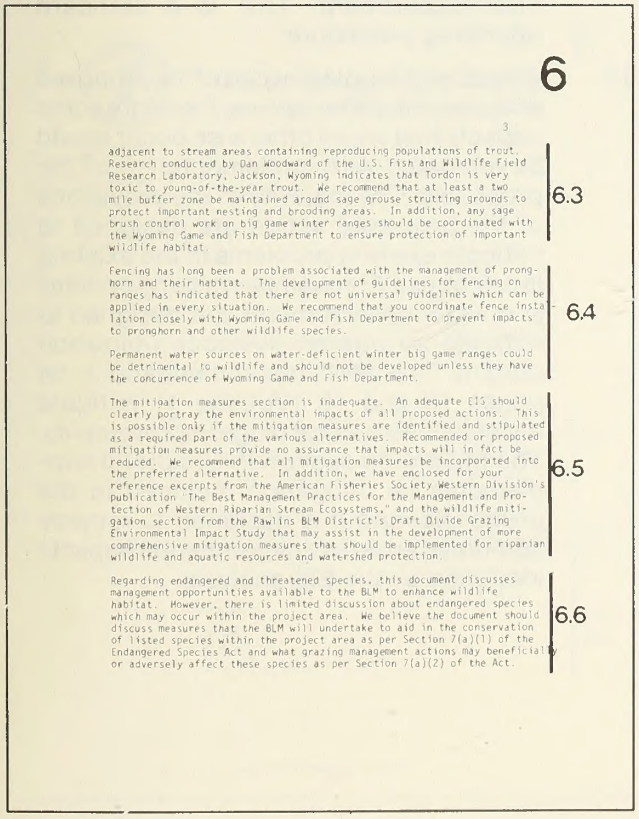
Protection and Management, Policy and Protection Procedures. The Guidelines state that, "Riparian areas which presently or potentially support broadleaf vegetation in arid and semi-arid ecosystems are of special management concern" (emphasis added). One of the stated objectives is to "implement a management system to protect, maintain, and enhance all wetland-riparian areas administered by BLM." The guidelines further state that BLM policy will be to "Avoid the long and short-term adverse impacts associated with the distribution, loss, or degradation of wetland-riparian areas"... and "Preserve and enhance the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage." We do not believe that the DEIS adequately observed these guidelines. We recommend that during preparation of the Final EIS and selection of an alternative, more attention be given to wetland-riparian habitats and needed protection not be delayed until long-term monitoring is completed. In addition, we recommend that the riparian improvement recommendations contained in alternative three be incorporated into the preferred alternative and continuation of the very beneficial riparian restoration program through beaver management that your district has instituted be continued. This office is willing to assist your staff in the development of site-specific plans to protect these important resources.

We disagree with your premise on page 69 that streambottom recovery can be obtained by managing livestock at the existing stocking levels whereby animals would be removed from the streambottoms through rotation grazing and additional upland forage production. Hormay[1] (personal communication with District Fishery Biologist-BLM, 1976) stated that rest-rotation grazing would be detrimental to riparian areas, and they should be fenced for protection. Therefore, we recommend you clarify your premise and implement management techniques that will ensure the protection of riparian areas. 6.2

Another area of concern is the proposed sagebrush and noxious weed control on big game winter range, streams, and sage grouse leks. We recommend that a persistent water soluble herbicide such as Tordon not be used, and that noxious weeds be treated by using a highly selective tool such as the wick applicator. We are also concerned about the use of Tordon 6.3

[1] Hormay, August L. BLM Range Management Specialist at Washington, D.C. Telephone conversation 11 August 1976 with Rock Springs District Fisheries Biologist concerning rest-rotation grazing management. As referenced in the Sandy ES.



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adjacent to stream areas containing reproducing populations of trout. Research conducted by Dan Woodward of the U.S. Fish and Wildlife Field Research Laboratory, Jackson, Wyoming indicates that Tordon is very toxic to young-of-the-year trout. We recommend that at least a two mile buffer zone be maintained around sage grouse strutting grounds to protect important nesting and brooding areas. In addition, any sage brush control work on big game winter ranges should be coordinated with the Wyoming Game and Fish Department to ensure protection of important wildlife habitat. 6.3

Fencing has long been a problem associated with the management of pronghorn and their habitat. The development of guidelines for fencing on ranges has indicated that there are not universal guidelines which can be applied in every situation. We recommend that you coordinate fence installation closely with Wyoming Game and Fish Department to prevent impacts to pronghorn and other wildlife species. 6.4

Permanent water sources on water-deficient winter big game ranges could be detrimental to wildlife and should not be developed unless they have the concurrence of Wyoming Game and Fish Department.

The mitigation measures section is inadequate. An adequate EIS should clearly portray the environmental impacts of all proposed actions. This is possible only if the mitigation measures are identified and stipulated as a required part of the various alternatives. Recommended or proposed mitigation measures provide no assurance that impacts will in fact be reduced. We recommend that all mitigation measures be incorporated into the preferred alternative. In addition, we have enclosed for your reference excerpts from the American Fisheries Society Western Division's publication "The Best Management Practices for the Management and Protection of Western Riparian Stream Ecosystems," and the wildlife mitigation section from the Rawlins BLM District's Draft Divide Grazing Environmental Impact Study that may assist in the development of more comprehensive mitigation measures that should be implemented for riparian wildlife and aquatic resources and watershed protection. 6.5

Regarding endangered and threatened species, this document discusses management opportunities available to the BLM to enhance wildlife habitat. However, there is limited discussion about endangered species which may occur within the project area. We believe the document should discuss measures that the BLM will undertake to aid in the conservation of listed species within the project area as per Section 7(a)(1) of the Endangered Species Act and what grazing management actions may beneficially or adversely affect these species as per Section 7(a)(2) of the Act. 6.6

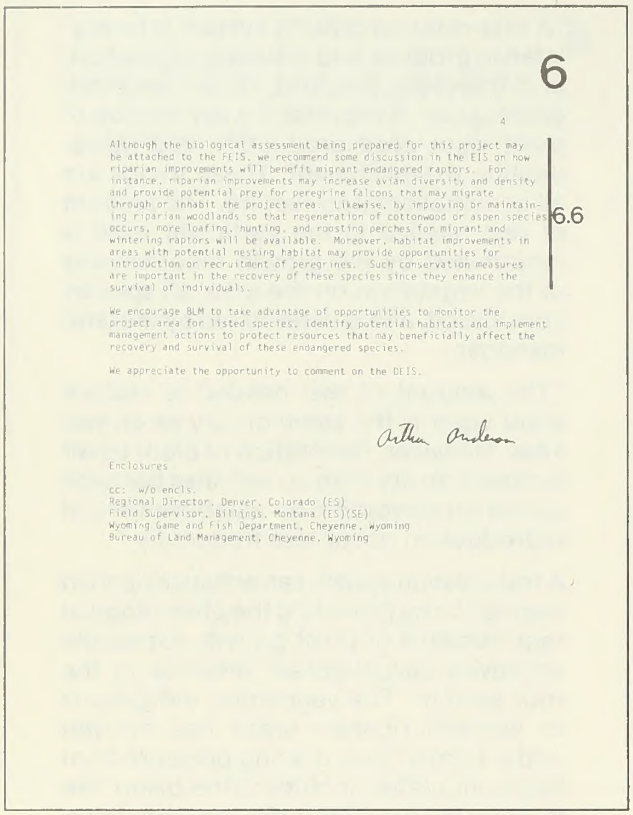
"A rest-rotation grazing system is formulated to produce and maintain vegetation, and therefore the land, under livestock grazing use. It provides for restoration of plant vigor seed production and reproduction establishment. These things are all accomplished by resting. The amount of rest needed in the particular case is determined by the growth requirements of the vegetation on the area, all species considered, and is determined by the land manager.

"The amount of rest needed to restore plant vigor is the same on dry as on wet sites. However, restoration of plant cover is slower on dry than on wet sites because conditions favorable for establishment of reproduction occur less frequently."

A rest-rotation system can enhance riparian vegetation by providing the physiological requirements of plant growth, especially improved carbohydrate reserves in the root system. The vegetation indigenous to western riparian areas has evolved under tremendous grazing pressure from large ungulates, including the bison. We feel that the greatest difference in grazing patterns between now and then is today's continuous use of local areas as opposed to the periods of rest after heavy use, which the bison did naturally in their wanderings over large regions. The principles of rest-rotation are the most feasible means by which to restore the grazing pattern which was predominant on western ranges for centuries.

Each grazing system must be uniquely designed for a specific area. Rest-rotation has been proposed for some areas, and simple deferred systems have been proposed for other areas. At present many details for each allotment are sketchy—such as fencing—pending further consultation in the AMP process. We will continue to work with the Wyoming Game and Fish Department, the livestock operators, and any other interested parties, in developing the management options for each grazing allotment where existing conditions warrant improvement.

While riparian exclosures have been valuable for the purpose of demonstrating riparian area improvements, we do not believe they are a viable approach for managing large acreages of rangeland. The miles of required fencing would be huge for the acreage to be protected, and



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Although the biological assessment being prepared for this project may be attached to the FEIS, we recommend some discussion in the EIS on how riparian improvements will benefit migrant endangered raptors. For instance, riparian improvements may increase avian diversity and density and provide potential prey for peregrine falcons that may migrate through or inhabit the project area. Likewise, by improving or maintaining riparian woodlands so that regeneration of cottonwood or aspen species occurs, more loafing, hunting, and roosting perches for migrant and wintering raptors will be available. Moreover, habitat improvements in areas with potential nesting habitat may provide opportunities for introduction or recruitment of peregrines. Such conservation measures are important in the recovery of these species since they enhance the survival of individuals. 6.6

We encourage BLM to take advantage of opportunities to monitor the project area for listed species, identify potential habitats and implement management actions to protect resources that may beneficially affect the recovery and survival of these endangered species.

We appreciate the opportunity to comment on the DEIS.

Arthur Anderson

Enclosures

cc: w/o encls.
Regional Director, Denver, Colorado (ES)
Field Supervisor, Billings, Montana (ES)(SE)
Wyoming Game and Fish Department, Cheyenne, Wyoming
Bureau of Land Management, Cheyenne, Wyoming

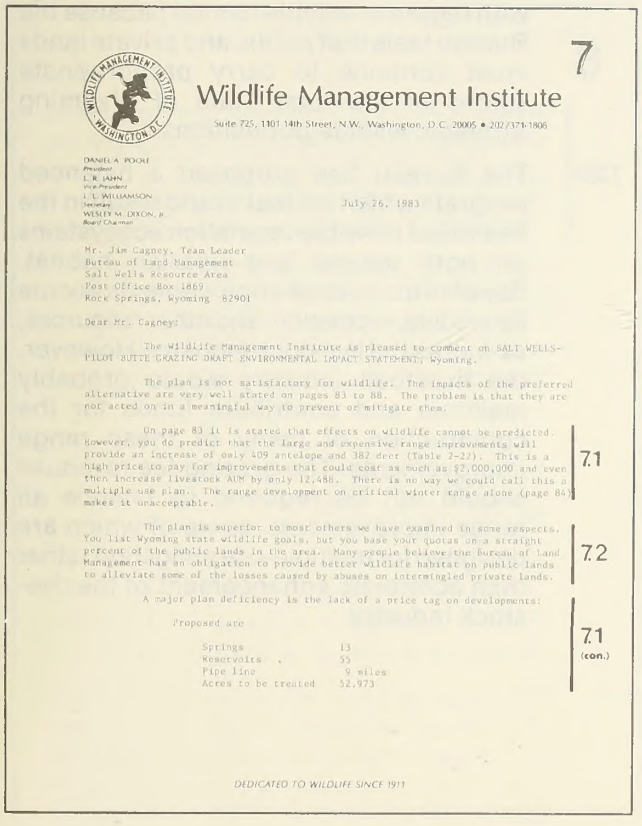
the maintenance costs would be prohibitive.

6.3 The Bureau would follow the guidelines of the Environmental Protection Agency, Wyoming Department of Environmental Quality, and other appropriate agencies. Please refer to the ***Rock Springs District Designated Noxious Weed Control Environmental Assessment*** (BLM 1982). The EA states that Tordon would not be applied near trout waters when yolk-sac and swim-up fry are present. Woodward's study was consulted for that EA. Use of the wick applicator is proposed for all treatment sites near Colorado River and Bear River cutthroat streams. No sagebrush treatment would take place in riparian areas, and the Bureau recognizes the two-mile buffer zone around sage grouse strutting grounds on page 15, Volume 1 of the grazing EIS. Although the Bureau proposes to treat 20 percent of these areas within a ten-year period, the resource would be adequately protected by judicious use of chemical treatments. Any treatment which has not been specifically addressed in a previous environmental document would require an environmental assessment before the project is initiated.

6.4 Proposed range improvements would be coordinated with the Wyoming Game and Fish Department. This is a standard operating procedure.

6.5 Mitigation is an integral part of the proposed action and the alternatives; therefore some impacts that might otherwise occur would be mitigated with implementation of the proposals. The majority of the provisions of the proposed action are designed to mitigate existing problems in the existing livestock use. For example, grazing systems and water developments are designed to mitigate an uneven livestock utilization pattern. The MFP recommendations on pages 13 and 15 (Volume 1) mitigate undesirable effects of range improvements. The mitigation section in Chapter 3 supplements he mitigation included in the proposals, and it is designed to remedy additional adverse environmental impacts identified by the EIS analysis.

6.6 The Bureau of Land Management would abide by the provisions of the ***Endangered Species Act***, as specified on page 35 of EIS Volume 1; also refer to page 21, item b(2). Further consultation with Fish and Wildlife Service would occur at the time the allotment management plans (AMPs) for any affected allotments are developed. The current prey base of Richardson's ground squirrels and whitetail prairie dogs is considered adequate for all birds of prey in the area. The improved riparian conditions projected in the draft EIS should enhance habitat conditions for marsh hawks and other birds of prey which use these areas. Such improvements would be discussed in the affected AMPs.



7

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
E.R. JAHN
Vice President
I.L. WILLIAMSON
Secretary
WESLEY M. DIXON, JR.
Board Chairman

July 26, 1983

Mr. Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
Post Office Box 1869
Rock Springs, Wyoming 82901

Dear Mr. Cagney:

The Wildlife Management Institute is pleased to comment on SALT WELLS-PILOT BUTTE GRAZING DRAFT ENVIRONMENTAL IMPACT STATEMENT, Wyoming.

The plan is not satisfactory for wildlife. The impacts of the preferred alternative are very well stated on pages 83 to 88. The problem is that they are not acted on in a meaningful way to prevent or mitigate them.

On page 83 it is stated that effects on wildlife cannot be predicted. However, you do predict that the large and expensive range improvements will provide an increase of only 409 antelope and 382 deer (Table 2-22). This is a high price to pay for improvements that could cost as much as $2,000,000 and even then increase livestock AUM by only 12,488. There is no way we could call this a multiple use plan. The range development on critical winter range alone (page 86) makes it unacceptable. 7.1

The plan is superior to most others we have examined in some respects. You list Wyoming state wildlife goals, but you base your quotas on a straight percent of the public lands in the area. Many people believe the Bureau of Land Management has an obligation to provide better wildlife habitat on public lands to alleviate some of the losses caused by abuses on intermingled private lands. 7.2

A major plan deficiency is the lack of a price tag on developments:

Proposed are

Springs	13
Reservoirs	55
Pipeline	9 miles
Acres to be treated	52,973

7.1 (con.)

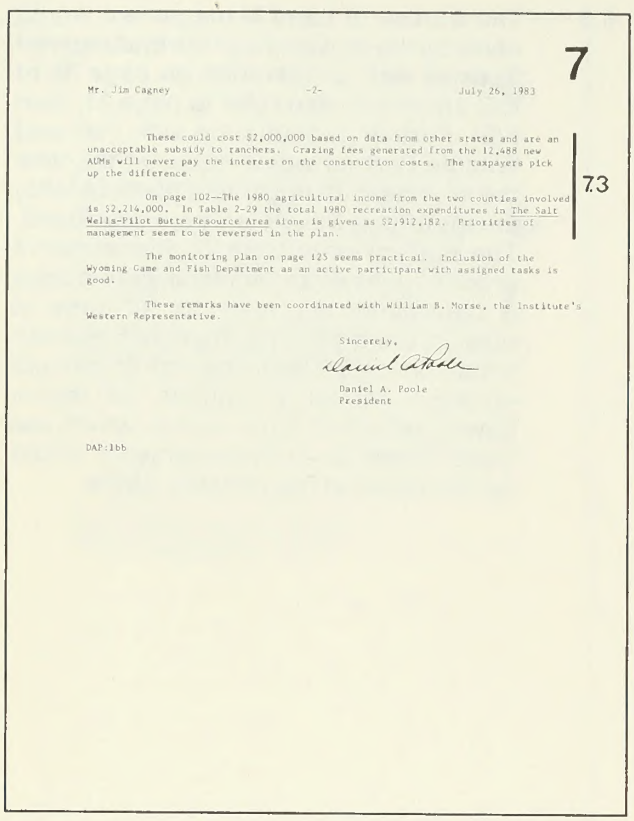
DEDICATED TO WILDLIFE SINCE 1911

RESPONSES TO LETTER NO. 7

7.1 The Bureau used the following calculations in the development of the proposed action:

Number/Type of Development	Cost Per Unit	Total Cost
13 spring developments	$ 3,000	$ 39,000
55 reservoirs	$ 3,500	$192,500
9 miles of pipeline	$ 5,000	$ 45,000
50,877 acres of prescribed burns	$ 4	$203,508
2,096 acres of chemical treatment	$ 15	$ 31,440
160 miles of fence	$ 2,500	$400,000
TOTAL		**$911,448**

Considering special added costs such as cattleguards, troughs, cost over-runs, and other items, the Bureau feels your estimate or project costs are only slightly inflated. While numbers like 409 antelope, 382 deer, and 12,488 AUMs may seem small in comparison to total costs; these gains



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Mr. Jim Cagney -2- July 26, 1983

These could cost $2,000,000 based on data from other states and are an unacceptable subsidy to ranchers. Grazing fees generated from the 12,488 new AUMs will never pay the interest on the construction costs. The taxpayers pick up the difference. 7.3

On page 102--The 1980 agricultural income from the two counties involved is $2,214,000. In Table 2-29 the total 1980 recreation expenditures in The Salt Wells-Pilot Butte Resource Area alone is given as $2,912,182. Priorities of management seem to be reversed in the plan.

The monitoring plan on page 125 seems practical. Inclusion of the Wyoming Game and Fish Department as an active participant with assigned tasks is good.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

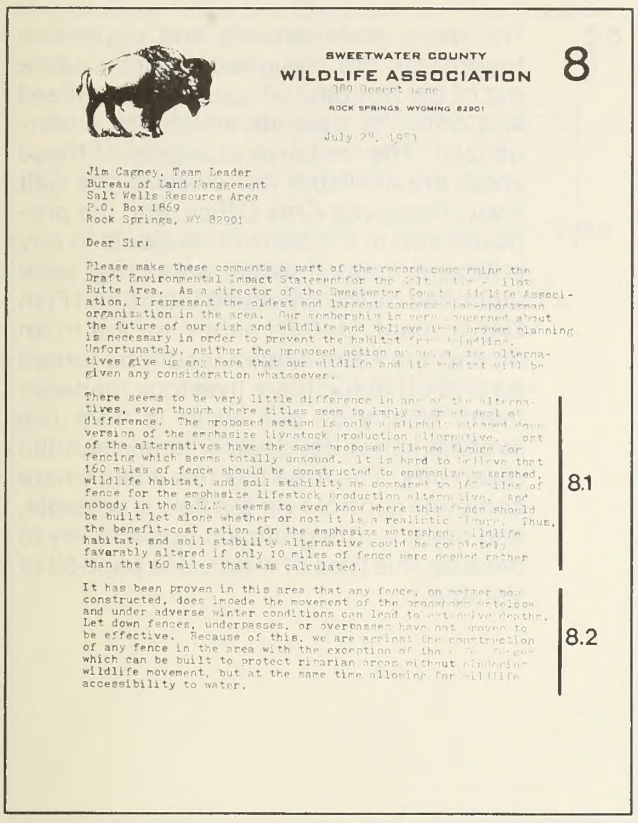
DAP:lbb

would be added on a sustained yield basis that would be preceded by a reversal of the current unsatisfactory trend. A comparison of the projections for the Proposed Action with those for the Continuation of Existing Situation Alternative (see Table 1-1 of this volume) puts these figures in better perspective. Additional benefits, such as improved watershed quality, cannot be quantified with the existing data base.

While some water and vegetation treatment projects are earmarked for areas that may be winter range, no projects would be developed in critical or crucial winter ranges identified by Wyoming Game and Fish Department.

7.2 In an area that contains nearly 2 million acres of checkerboard ownership lands, it can be assumed that the grazing management of public and private lands is essentially the same. In the solid block ownership lands, most of the private and State lands are managed in conjunction with the predominant uses of the surrounding public land. Exceptions to this "in conjunction" use generally are confined to fenced hay fields which, in this area, are typically not "abused". A distinction is made between public and private lands with regard to wildlife habitat because the Bureau feels that public and private lands must continue to carry proportionate shares of the total State of Wyoming Strategic wildlife populations.

7.3 The Bureau has proposed a balanced program which we feel would result in the healthiest possible vegetation ecosystems on both upland and riparian habitat. Benefits from range improvements accrue for wildlife, recreation, and other resources, as well as the livestock industry. However, the livestock industry would probably maintain and contribute funds for the construction of many of these range improvements. The grazing fee revenues should not be required to finance all range improvements, some of which are designed for multiple-use mitigation rather than economic enhancement of the livestock industry.



SWEETWATER COUNTY
WILDLIFE ASSOCIATION
300 Desert Lane
ROCK SPRINGS, WYOMING 82901

8

July 2nd, 1981

Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
P.O. Box 1869
Rock Springs, WY 82901

Dear Sir:

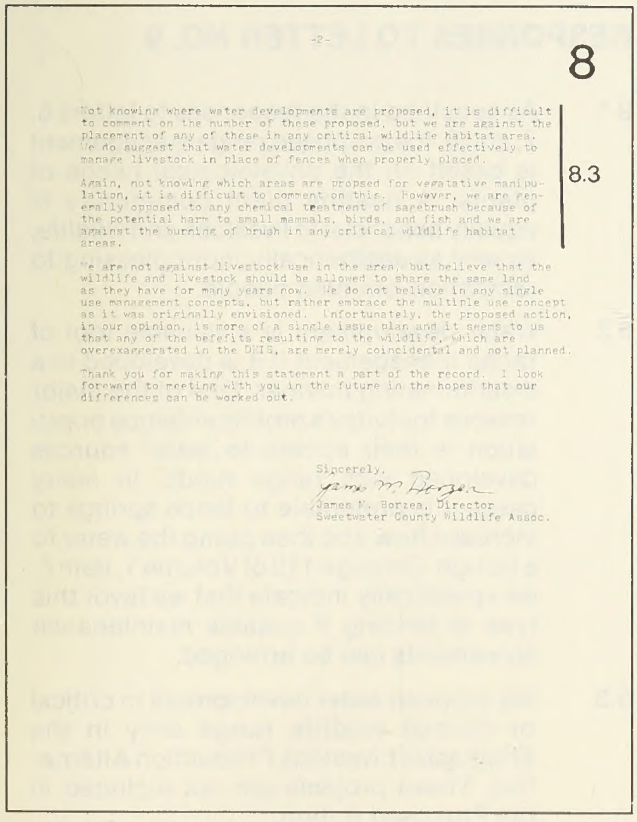
Please make these comments a part of the record concerning the Draft Environmental Impact Statement for the Salt Wells - Pilot Butte Area. As a director of the Sweetwater County Wildlife Association, I represent the oldest and largest conservation-sportsman organization in the area. Our membership is very concerned about the future of our fish and wildlife and believe that proper planning is necessary in order to prevent the habitat from dwindling. Unfortunately, neither the proposed action or any of the alternatives give us any hope that our wildlife and its habitat will be given any consideration whatsoever.

There seems to be very little difference in any of the alternatives, even though there titles seem to imply a great deal of difference. The proposed action is only a slightly watered down version of the emphasize livestock production alternative. Most of the alternatives have the same proposed mileage figure for fencing which seems totally unsound. It is hard to believe that 160 miles of fence should be constructed to emphasize watershed, wildlife habitat, and soil stability as compared to 160 miles of fence for the emphasize lifestock production alternative. And nobody in the B.L.M. seems to even know where this fence should be built let alone whether or not it is a realistic figure. Thus, the benefit-cost ration for the emphasize watershed, wildlife habitat, and soil stability alternative could be completely favorably altered if only 10 miles of fence were needed rather than the 160 miles that was calculated.

8.1

It has been proven in this area that any fence, no matter how constructed, does impede the movement of the pronghorn antelope and under adverse winter conditions can lead to extensive deaths. Let down fences, underpasses, or overpasses have not proven to be effective. Because of this, we are against the construction of any fence in the area with the exception of those fences which can be built to protect riparian areas without hindering wildlife movement, but at the same time allowing for wildlife accessibility to water.

8.2



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Not knowing where water developments are proposed, it is difficult to comment on the number of these proposed, but we are against the placement of any of these in any critical wildlife habitat area. We do suggest that water developments can be used effectively to manage livestock in place of fences when properly placed.

8.3

Again, not knowing which areas are propsed for vegatative manipulation, it is difficult to comment on this. However, we are generally opposed to any chemical treatment of sagebrush because of the potential harm to small mammals, birds, and fish and we are against the burning of brush in any critical wildlife habitat areas.

We are not against livestock use in the area, but believe that the wildlife and livestock should be allowed to share the same land as they have for many years now. We do not believe in any single use management concepts, but rather embrace the multiple use concept as it was originally envisioned. Unfortunately, the proposed action, in our opinion, is more of a single issue plan and it seems to us that any of the befefits resulting to the wildlife, which are overexaggerated in the DMIS, are merely coincidental and not planned.

Thank you for making this statement a part of the record. I look forward to meeting with you in the future in the hopes that our differences can be worked out.

Sincerely,

James M. Borzea

James M. Borzea, Director
Sweetwater County Wildlife Assoc.

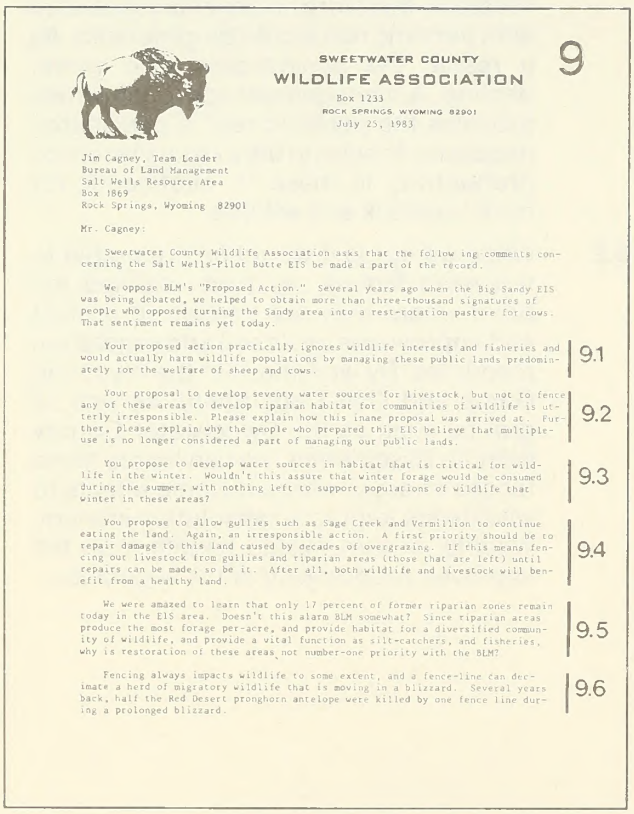
RESPONSES TO LETTER NO. 8

8.1 We feel that alternatives which drastically favor one resource to the extent that they become extreme rob the public of real choices by funneling all moderate ideas to the proposed action. For this reason, the Emphasize Watershed, Wildlife, and Soils Alternative; the Emphasize Livestock Production Alternative; and the Proposed Action are designed as variations of a similar theme. Each could be reasonably chosen. Alternative 4 - License No Livestock Use on Public Lands - specifically proposes no range improvements except those "compatible with other resource objectives" and further proposes to allow wildlife to "expand to the carrying capacity of their habitat".

The exact locations of range improvements will be specified in site-specific environmental assessments prior to implementation. Tentative locations are available for review. The 160-mile figure was used throughout the document is roughly the amount of fencing needed to geographically divide the "I" grazing allotments into pastures for more intensive livestock management. We firmly believe this is a realistic figure. Ten miles of fence would not be sufficient to adequately control the livestock, therefore no benefits associated with periodic rest would be generated. As a result, the benefit/cost ratio would decline. A management approach which provides the periodic rest is considered necessary to sustain the existing resource productivity in these "I" allotments, for both livestock and wildlife.

8.2 While we agree it would be preferable to not need fences, we have reached the point where they are needed to protect and improve the basic soil and vegetation resources. By working with the Wyoming Game and Fish Department, as well as groups such as the Sweetwater County Wildlife Association, we can locate these fences in areas where adverse effects to wildlife are kept to an absolute minimum. Wildlife, in turn, would benefit from the improved productivity of the vegetation.

8.3 The water developments and vegetation treatments are designed to draw cattle out of the bottoms which are overutilized and onto the uplands which are underutilized. The tentative locations of these areas are available for review in the Salt Wells Resource Area Office, and the proposed action contains no projects in any critical or crucial winter areas that were identified by the Wyoming Game and Fish Department. Unfortunately we are in an area where water cannot readily be turned on and off to facilitate livestock management. Nearly all our water is from live streams, spring developments, and earthen reservoirs. The area has few wells where complete control over the flow is possible, and there is no significant opportunity to develop this type of water. See page 50 of Volume 1.



SWEETWATER COUNTY
WILDLIFE ASSOCIATION
Box 1233
ROCK SPRINGS, WYOMING 82901

9

July 25, 1983

Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
Box 1869
Rock Springs, Wyoming 82901

Mr. Cagney:

Sweetwater County Wildlife Association asks that the follow ing comments concerning the Salt Wells-Pilot Butte EIS be made a part of the record.

We oppose BLM's "Proposed Action." Several years ago when the Big Sandy EIS was being debated, we helped to obtain more than three-thousand signatures of people who opposed turning the Sandy area into a rest-rotation pasture for cows. That sentiment remains yet today.

Your proposed action practically ignores wildlife interests and fisheries and would actually harm wildlife populations by managing these public lands predominately for the welfare of sheep and cows. 9.1

Your proposal to develop seventy water sources for livestock, but not to fence any of these areas to develop riparian habitat for communities of wildlife is utterly irresponsible. Please explain how this inane proposal was arrived at. Further, please explain why the people who prepared this EIS believe that multiple-use is no longer considered a part of managing our public lands. 9.2

You propose to develop water sources in habitat that is critical for wildlife in the winter. Wouldn't this assure that winter forage would be consumed during the summer, with nothing left to support populations of wildlife that winter in these areas? 9.3

You propose to allow gullies such as Sage Creek and Vermillion to continue eating the land. Again, an irresponsible action. A first priority should be to repair damage to this land caused by decades of overgrazing. If this means fencing out livestock from gullies and riparian areas (those that are left) until repairs can be made, so be it. After all, both wildlife and livestock will benefit from a healthy land. 9.4

We were amazed to learn that only 17 percent of former riparian zones remain today in the EIS area. Doesn't this alarm BLM somewhat? Since riparian areas produce the most forage per-acre, and provide habitat for a diversified community of wildlife, and provide a vital function as silt-catchers, and fisheries, why is restoration of these areas not number-one priority with the BLM? 9.5

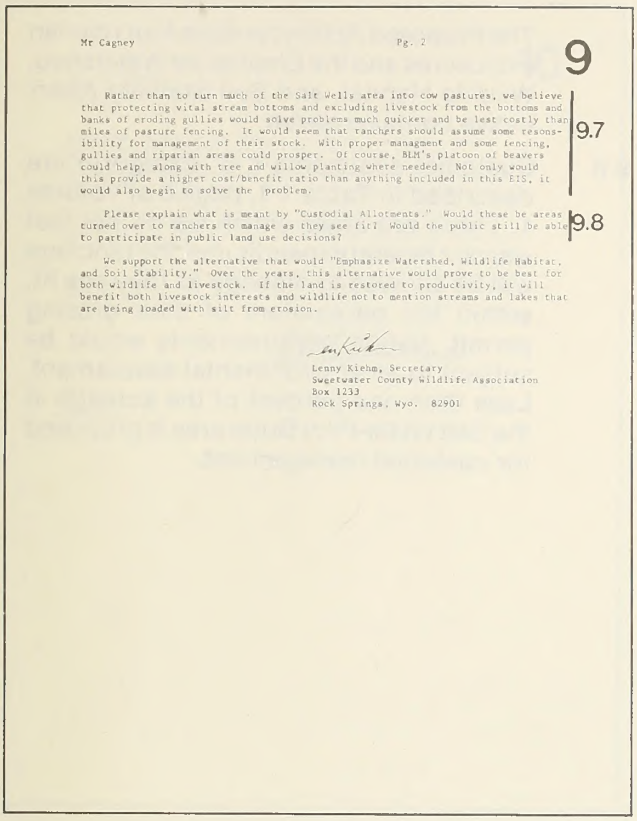
Fencing always impacts wildlife to some extent, and a fence-line can decimate a herd of migratory wildlife that is moving in a blizzard. Several years back, half the Red Desert pronghorn antelope were killed by one fence line during a prolonged blizzard. 9.6

RESPONSES TO LETTER NO. 9

9.1 As specified in the responses to letters 6, 7, and 8, the proposed range management is based on the physiological needs of plants. A healthy plant community is equally beneficial to livestock and wildlife, as well as aesthetically more pleasing to recreation-oriented people.

9.2 Water development is a valuable tool of range management if it is developed in a discriminating manner. One of the major reasons for today's prolific antelope population is their access to water sources developed with range funds. In many cases it is preferable to fence springs to increase flow and then pump the water to a trough. On page 110 of Volume 1, item 8, we specifically indicate that we favor this type of fencing if suitable maintenance agreements can be arranged.

9.3 We propose water development in critical or crucial wildlife range only in the Emphasize Livestock Production Alternative. These projects are not included in the Proposed Action.



Mr Cagney Pg. 2

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Rather than to turn much of the Salt Wells area into cow pastures, we believe that protecting vital stream bottoms and excluding livestock from the bottoms and banks of eroding gullies would solve problems much quicker and be lest costly than miles of pasture fencing. It would seem that ranchers should assume some resonsibility for management of their stock. With proper managment and some fencing, gullies and riparian areas could prosper. Of course, BLM's platoon of beavers could help, along with tree and willow planting where needed. Not only would this provide a higher cost/benefit ratio than anything included in this EIS, it would also begin to solve the problem. 9.7

Please explain what is meant by "Custodial Allotments." Would these be areas turned over to ranchers to manage as they see fit? Would the public still be able to participate in public land use decisions? 9.8

We support the alternative that would "Emphasize Watershed, Wildlife Habitat, and Soil Stability." Over the years, this alternative would prove to be best for both wildlife and livestock. If the land is restored to productivity, it will benefit both livestock interests and wildlife not to mention streams and lakes that are being loaded with silt from erosion.

Lenny Kiehm, Secretary
Sweetwater County Wildlife Association
Box 1233
Rock Springs, Wyo. 82901

9.4 While we agree that livestock use (particularly historical overuse) is partially responsible for gully headcutting, we do not believe it is reasonable to declare that livestock are the sole cause of this problem. Poorly planned road construction, especially with respect to culverts is a major source of headcutting. Excessive trapping of beavers in the mid-1800s, has probably had a dramatic effect on the hydrologic character of these streams. A reasonable argument can be presented that gully headcutting is a naturally occurring cyclic phenomenon. Sage Creek, which flows 1,000 feet below the Mellor Mountain Rim, has obviously been carving its canyon for thousands of years.

Correcting problems of headcuts are generally handled directly through watershed funds, and such plans are designed by hydrologists. The type of activity which the Bureau is currently developing in the Red Creek Basin is not within the scope of a grazing EIS. Assuring that the physiological requirements of the plants are met is the best corrective measure which can be implemented, with respect to grazing management.

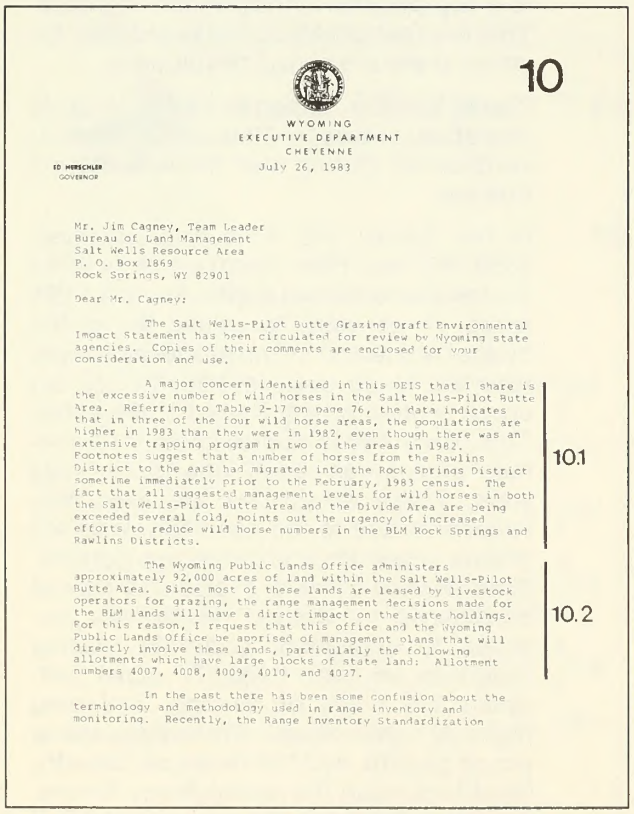
9.5 Correcting the loss of riparian habitat and associated soil losses through headcutting is a top priority management objective. This is an extremely complex problem for which there are no quick solutions.

9.6 Please see the response to 8.2. Historic migration routes of wildlife will be carefully considered during the implementation process.

9.7 In the Sandy EIS Area approximately $650,000 have been spent on 26 riparian exclosures to protect approximately 1,956 acres. If we were to utilize the entire budget requested by the proposed action, rounded to an even million dollars, we could protect an equivalent 3,000 acres. This computes to approximately 19 one-mile exclosures, each one-fourth mile wide. These exclosures are extremely expensive due to the need for elaborate stream crossings and numerous corners. Maintenance of these exclosures cannot be assured. In contrast, the Bureau proposes to implement scientific grazing practices on over 1,006,000 acres with about 210 miles of fencing, including highway rights-of-way. Entire watersheds would benefit, and the livestock industry would maintain the nonhighway fences. We agree this is a slow process, but feel this is the correct course to pursue.

The Proposed Action contains four riparian exclosures and the Emphasize Watershed, Wildlife Habitat, and Soil Stability Alternative contains seven.

9.8 Custodial allotments ("C" category) are described in Table 1-1, page 6 of Volume 1. These are areas which we do not feel warrant federal expenditures; the ranchers will be allowed to manage as they see fit, within the parameters of their grazing permit. Range improvements would be subject to an environmental assessment. Less than one percent of the acreage in the Salt Wells-Pilot Butte area is proposed for custodial management.



10

WYOMING
EXECUTIVE DEPARTMENT
CHEYENNE

ED HERSCHLER
GOVERNOR

July 26, 1983

Mr. Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
P. O. Box 1869
Rock Springs, WY 82901

Dear Mr. Cagney:

The Salt Wells-Pilot Butte Grazing Draft Environmental Imoact Statement has been circulated for review by Wyoming state agencies. Copies of their comments are enclosed for your consideration and use.

A major concern identified in this DEIS that I share is the excessive number of wild horses in the Salt Wells-Pilot Butte Area. Referring to Table 2-17 on page 76, the data indicates that in three of the four wild horse areas, the populations are higher in 1983 than they were in 1982, even though there was an extensive trapping program in two of the areas in 1982. Footnotes suggest that a number of horses from the Rawlins District to the east had migrated into the Rock Springs District sometime immediately prior to the February, 1983 census. The fact that all suggested management levels for wild horses in both the Salt Wells-Pilot Butte Area and the Divide Area are being exceeded several fold, points out the urgency of increased efforts to reduce wild horse numbers in the BLM Rock Springs and Rawlins Districts. 10.1

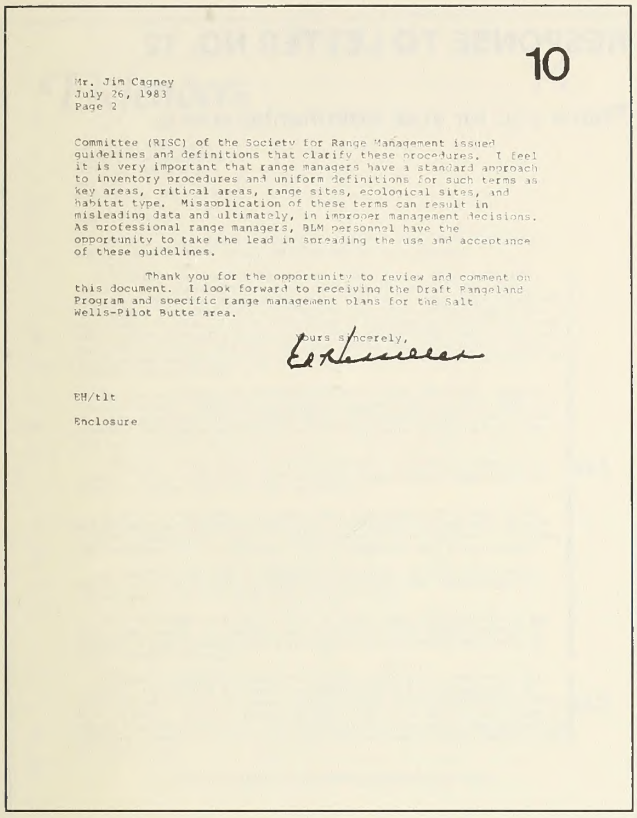
The Wyoming Public Lands Office administers approximately 92,000 acres of land within the Salt Wells-Pilot Butte Area. Since most of these lands are leased by livestock operators for grazing, the range management decisions made for the BLM lands will have a direct impact on the state holdings. For this reason, I request that this office and the Wyoming Public Lands Office be apprised of management plans that will directly involve these lands, particularly the following allotments which have large blocks of state land: Allotment numbers 4007, 4008, 4009, 4010, and 4027. 10.2

In the past there has been some confusion about the terminology and methodology used in range inventory and monitoring. Recently, the Range Inventory Standardization

RESPONSES TO LETTER NO. 10

10.1 The Bureau will continue to gather horses until the population levels are in accordance with court orders and agreements reached with affected private landowners. The BLM has recently made significant inroads toward solving this problem and should be reaching the goal of 850 head in the Salt Wells-Pilot Butte area in the near future.

10.2 We will coordinate all range management projects with the Wyoming Public Lands Office, the Game and Fish Department, and other appropriate State agencies.



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Mr. Jim Cagney
July 26, 1983
Page 2

Committee (RISC) of the Society for Range Management issued guidelines and definitions that clarify these procedures. I feel it is very important that range managers have a standard approach to inventory procedures and uniform definitions for such terms as key areas, critical areas, range sites, ecological sites, and habitat type. Misapplication of these terms can result in misleading data and ultimately, in improper management decisions. As professional range managers, BLM personnel have the opportunity to take the lead in spreading the use and acceptance of these guidelines.

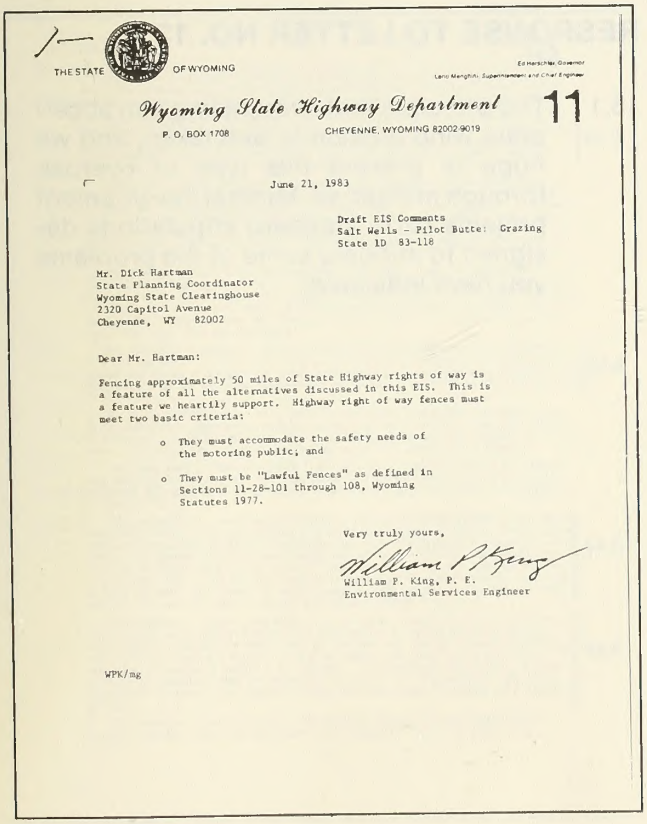
Thank you for the opportunity to review and comment on this document. I look forward to receiving the Draft Rangeland Program and specific range management plans for the Salt Wells-Pilot Butte area.

Yours sincerely,

Ed Hensley

EH/tlt

Enclosure



THE STATE OF WYOMING

Ed Herschler, Governor
Lenz Menghini, Superintendent and Chief Engineer

Wyoming State Highway Department

11

P. O. BOX 1708 CHEYENNE, WYOMING 82002-9019

June 21, 1983

Draft EIS Comments
Salt Wells - Pilot Butte: Grazing
State ID 83-118

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Dear Mr. Hartman:

Fencing approximately 50 miles of State Highway rights of way is a feature of all the alternatives discussed in this EIS. This is a feature we heartily support. Highway right of way fences must meet two basic criteria:

- o They must accommodate the safety needs of the motoring public; and
- o They must be "Lawful Fences" as defined in Sections 11-28-101 through 108, Wyoming Statutes 1977.

Very truly yours,

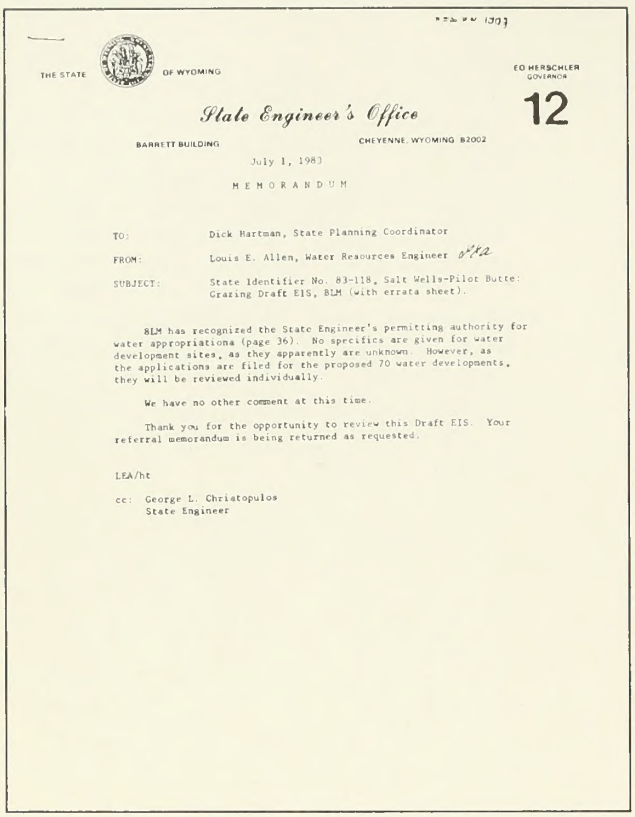
William P. King

William P. King, P. E.
Environmental Services Engineer

WPK/mg

RESPONSE TO LETTER NO. 11

Thank you for your comments.



THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

State Engineer's Office

12

BARRETT BUILDING CHEYENNE, WYOMING 82002

July 1, 1983

MEMORANDUM

TO: Dick Hartman, State Planning Coordinator

FROM: Louis E. Allen, Water Resources Engineer

SUBJECT: State Identifier No. 83-118, Salt Wells-Pilot Butte Grazing Draft EIS, BLM (with errata sheet).

BLM has recognized the State Engineer's permitting authority for water appropriations (page 36). No specifics are given for water development sites, as they apparently are unknown. However, as the applications are filed for the proposed 70 water developments, they will be reviewed individually.

We have no other comment at this time.

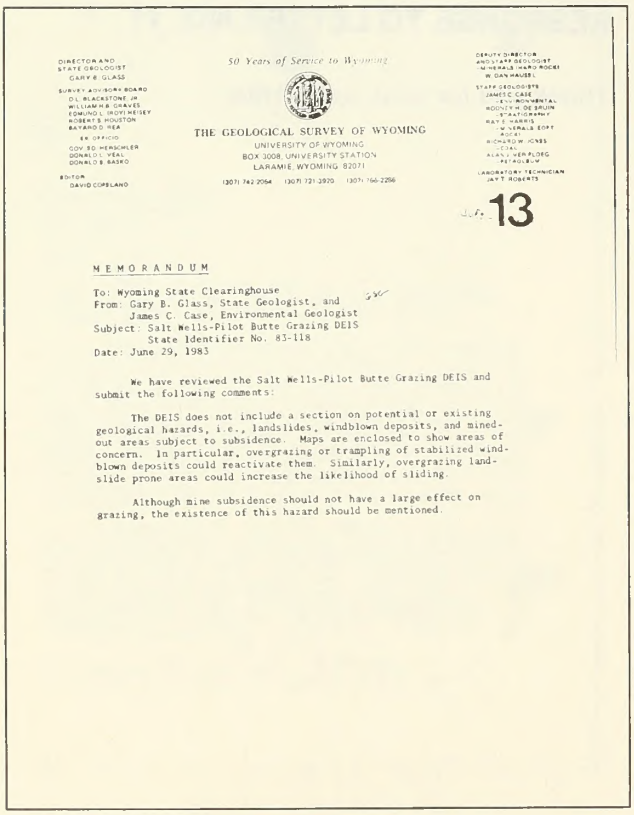
Thank you for the opportunity to review this Draft EIS. Your referral memorandum is being returned as requested.

LEA/ht

cc: George L. Christopulos
State Engineer

RESPONSE TO LETTER NO. 12

Thank you for your comments.



50 Years of Service to Wyoming

THE GEOLOGICAL SURVEY OF WYOMING
UNIVERSITY OF WYOMING
BOX 3008, UNIVERSITY STATION
LARAMIE, WYOMING 82071
(307) 742-2054 (307) 721-2325 (307) 766-2286

13

MEMORANDUM

To: Wyoming State Clearinghouse
From: Gary B. Glass, State Geologist, and
James C. Case, Environmental Geologist
Subject: Salt Wells-Pilot Butte Grazing DEIS
State Identifier No. 83-118
Date: June 29, 1983

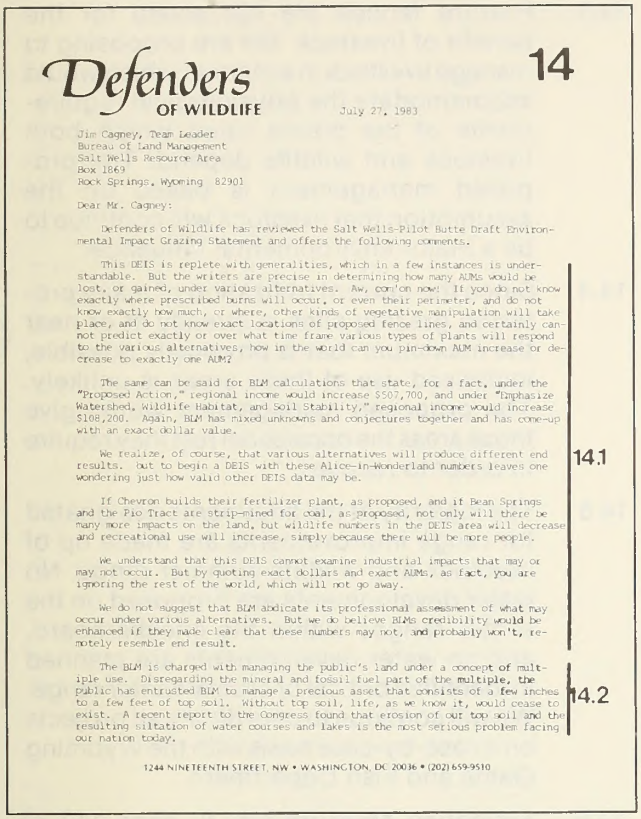
We have reviewed the Salt Wells-Pilot Butte Grazing DEIS and submit the following comments:

The DEIS does not include a section on potential or existing geological hazards, i.e., landslides, windblown deposits, and mined-out areas subject to subsidence. Maps are enclosed to show areas of concern. In particular, overgrazing or trampling of stabilized wind-blown deposits could reactivate them. Similarly, overgrazing land-slide prone areas could increase the likelihood of sliding.

Although mine subsidence should not have a large effect on grazing, the existence of this hazard should be mentioned.

RESPONSE TO LETTER NO. 13

13.1 The principle that overgrazing can accelerate wind erosion is well taken, and we hope to prevent this type of overuse through mitigation. Mineral development projects carry standard stipulations designed to mitigate some of the problems you have indicated.



Defenders
OF WILDLIFE

14

July 27, 1983

Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
Box 1869
Rock Springs, Wyoming 82901

Dear Mr. Cagney:

Defenders of Wildlife has reviewed the Salt Wells-Pilot Butte Draft Environmental Impact Grazing Statement and offers the following comments.

This DEIS is replete with generalities, which in a few instances is understandable. But the writers are precise in determining how many AUMs would be lost, or gained, under various alternatives. Aw, com'on now! If you do not know exactly where prescribed burns will occur, or even their perimeter, and do not know exactly how much, or where, other kinds of vegetative manipulation will take place, and do not know exact locations of proposed fence lines, and certainly cannot predict exactly or over what time frame various types of plants will respond to the various alternatives, how in the world can you pin-down AUM increase or decrease to exactly one AUM?

The same can be said for BLM calculations that state, for a fact, under the "Proposed Action," regional income would increase $507,700, and under "Emphasize Watershed, Wildlife Habitat, and Soil Stability," regional income would increase $108,200. Again, BLM has mixed unknowns and conjectures together and has come-up with an exact dollar value.

We realize, of course, that various alternatives will produce different end results. But to begin a DEIS with these Alice-in-Wonderland numbers leaves one wondering just how valid other DEIS data may be. 14.1

If Chevron builds their fertilizer plant, as proposed, and if Bean Springs and the Pio Tract are strip-mined for coal, as proposed, not only will there be many more impacts on the land, but wildlife numbers in the DEIS area will decrease and recreational use will increase, simply because there will be more people.

We understand that this DEIS cannot examine industrial impacts that may or may not occur. But by quoting exact dollars and exact AUMs, as fact, you are ignoring the rest of the world, which will not go away.

We do not suggest that BLM abdicate its professional assessment of what may occur under various alternatives. But we do believe BLMs credibility would be enhanced if they made clear that these numbers may not, and probably won't, remotely resemble end result.

The BLM is charged with managing the public's land under a concept of multiple use. Disregarding the mineral and fossil fuel part of the multiple, the public has entrusted BLM to manage a precious asset that consists of a few inches to a few feet of top soil. Without top soil, life, as we know it, would cease to exist. A recent report to the Congress found that erosion of our top soil and the resulting siltation of water courses and lakes is the most serious problem facing our nation today. 14.2

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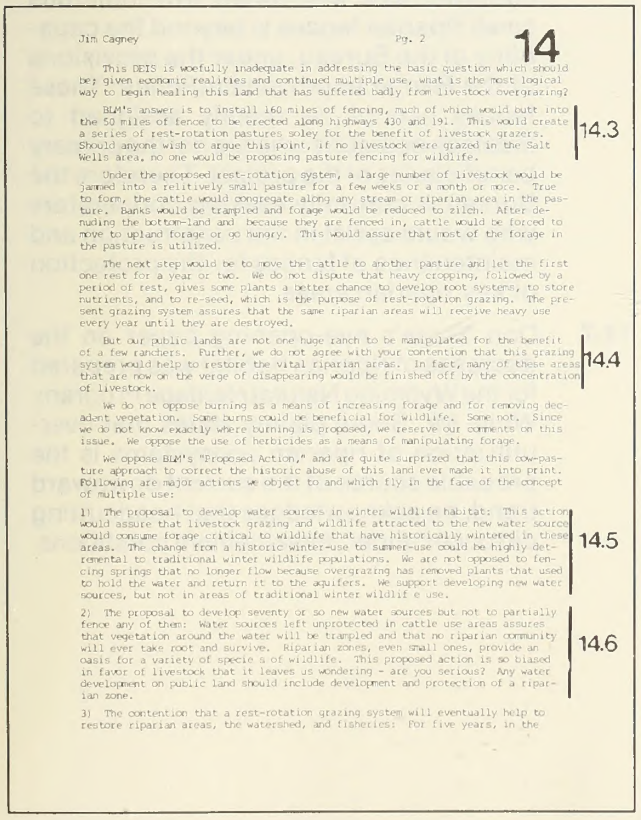


Jim Cagney Pg. 2

14

This DEIS is woefully inadequate in addressing the basic question which should be; given economic realities and continued multiple use, what is the most logical way to begin healing this land that has suffered badly from livestock overgrazing?

BLM's answer is to install 160 miles of fencing, much of which would butt into the 50 miles of fence to be erected along highways 430 and 191. This would create a series of rest-rotation pastures soley for the benefit of livestock grazers. Should anyone wish to argue this point, if no livestock were grazed in the Salt Wells area, no one would be proposing pasture fencing for wildlife. 14.3

Under the proposed rest-rotation system, a large number of livestock would be jammed into a relitively small pasture for a few weeks or a month or more. True to form, the cattle would congregate along any stream or riparian area in the pasture. Banks would be trampled and forage would be reduced to zilch. After denuding the bottom-land and because they are fenced in, cattle would be forced to move to upland forage or go hungry. This would assure that most of the forage in the pasture is utilized.

The next step would be to move the cattle to another pasture and let the first one rest for a year or two. We do not dispute that heavy cropping, followed by a period of rest, gives some plants a better chance to develop root systems, to store nutrients, and to re-seed, which is the purpose of rest-rotation grazing. The present grazing system assures that the same riparian areas will receive heavy use every year until they are destroyed.

But our public lands are not one huge ranch to be manipulated for the benefit of a few ranchers. Further, we do not agree with your contention that this grazing system would help to restore the vital riparian areas. In fact, many of these areas that are now on the verge of disappearing would be finished off by the concentration of livestock. 14.4

We do not oppose burning as a means of increasing forage and for removing decadent vegetation. Some burns could be beneficial for wildlife. Some not. Since we do not know exactly where burning is proposed, we reserve our comments on this issue. We oppose the use of herbicides as a means of manipulating forage.

We oppose BLM's "Proposed Action," and are quite surprized that this cow-pasture approach to correct the historic abuse of this land ever made it into print. Following are major actions we object to and which fly in the face of the concept of multiple use:

1) The proposal to develop water sources in winter wildlife habitat: This action would assure that livestock grazing and wildlife attracted to the new water sources would consume forage critical to wildlife that have historically wintered in these areas. The change from a historic winter-use to summer-use could be highly detrimental to traditional winter wildlife populations. We are not opposed to fencing springs that no longer flow because overgrazing has removed plants that used to hold the water and return it to the aquifers. We support developing new water sources, but not in areas of traditional winter wildlif e use. 14.5

2) The proposal to develop seventy or so new water sources but not to partially fence any of them: Water sources left unprotected in cattle use areas assures that vegetation around the water will be trampled and that no riparian community will ever take root and survive. Riparian zones, even small ones, provide an oasis for a variety of specie s of wildlife. This proposed action is so biased in favor of livestock that it leaves us wondering - are you serious? Any water development on public land should include development and protection of a riparian zone. 14.6

3) The contention that a rest-rotation grazing system will eventually help to restore riparian areas, the watershed, and fisheries: For five years, in the

RESPONSES TO LETTER NO. 14

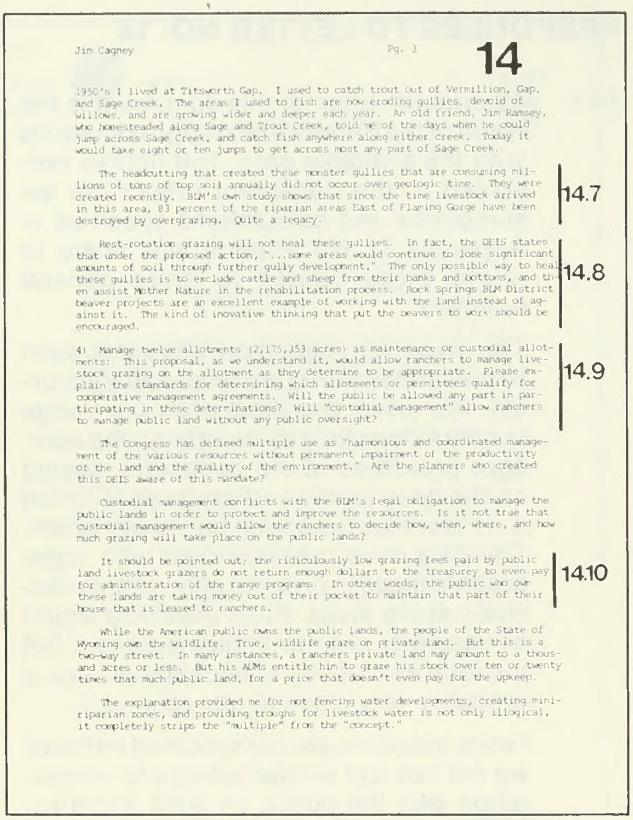
14.1 All quantification in this document is the result of the Bureau's best approximations with the available data. The figures presented in the document reflect the assumptions and calculations specified in Appendix D. No attempt was made to round these figures to more general numbers.

The areas for vegetation treatment such as prescribed burns are reasonably accurate. We used the data from our range survey extensively in identifying the acreages presented in the document, keying on the deep loamy and sandy soils which were identified as containing heavy brush. The data were crosschecked with topographic maps in order to eliminate excessively steep areas. Field checking would be essential prior to implementation, but the total availability of acceptable sites is probably very close to our estimates.

Fence locations are not specified because we did not feel we had adequate consultation with the public on such a controversial issue, and we did not wish to imply that the tentative locations were final. Tentative locations are available for review in the Salt Wells Resource Area office, and further consultation with interested parties is anticipated. Please note the response to 8.1.

We have tried to address the cumulative impacts of all land management actions on pages 112 and 113, but freely admit that all the possible combinations of industrial development are difficult to accurately predict. These developments would impact the grazing management program; nevertheless, the primary concern of this EIS is the impacts of grazing management on other resources.

14.2 We are in agreement with the concept that preservation of the soil resource is the ultimate natural resource management objective. More intensive range management practices incorporating periodic rest would protect the soil resource and subsequently reduce sediment loads by improving vegetation cover.



Jim Cagney Pg. 3

14

1950's I lived at Titsworth Gap. I used to catch trout out of Vermillion, Gap, and Sage Creek. The areas I used to fish are now eroding gullies, devoid of willows, and are growing wider and deeper each year. An old friend, Jim Ramsey, who homesteaded along Sage and Trout Creek, told me of the days when he could jump across Sage Creek, and catch fish anywhere along either creek. Today it would take eight or ten jumps to get across most any part of Sage Creek.

The headcutting that created these monster gullies that are consuming millions of tons of top soil annually did not occur over geologic time. They were created recently. BLM's own study shows that since the time livestock arrived in this area, 83 percent of the riparian areas East of Flaming Gorge have been destroyed by overgrazing. Quite a legacy. 14.7

Rest-rotation grazing will not heal these gullies. In fact, the DEIS states that under the proposed action, "...some areas would continue to lose significant amounts of soil through further gully development." The only possible way to heal these gullies is to exclude cattle and sheep from their banks and bottoms, and then assist Mother Nature in the rehabilitation process. Rock Springs BLM District beaver projects are an excellent example of working with the land instead of against it. The kind of inovative thinking that put the beavers to work should be encouraged. 14.8

4) Manage twelve allotments (2,175,353 acres) as maintenance or custodial allotments: This proposal, as we understand it, would allow ranchers to manage livestock grazing on the allotment as they determine to be appropriate. Please explain the standards for determining which allotments or permittees qualify for cooperative management agreements. Will the public be allowed any part in participating in these determinations? Will "custodial management" allow ranchers to manage public land without any public oversight? 14.9

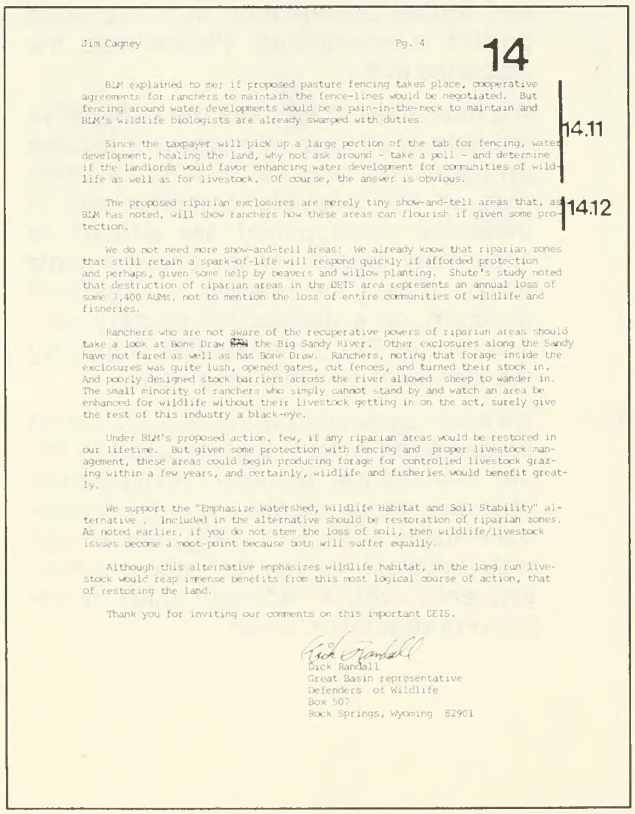
The Congress has defined multiple use as "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment." Are the planners who created this DEIS aware of this mandate?

Custodial management conflicts with the BLM's legal obligation to manage the public lands in order to protect and improve the resources. Is it not true that custodial management would allow the ranchers to decide how, when, where, and how much grazing will take place on the public lands?

It should be pointed out; the ridiculously low grazing fees paid by public land livestock grazers do not return enough dollars to the treasurey to even pay for administration of the range programs. In other words, the public who own these lands are taking money out of their pocket to maintain that part of their house that is leased to ranchers. 14.10

While the American public owns the public lands, the people of the State of Wyoming own the wildlife. True, wildlife graze on private land. But this is a two-way street. In many instances, a ranchers private land may amount to a thousand acres or less. But his AUMs entitle him to graze his stock over ten or twenty times that much public land, for a price that doesn't even pay for the upkeep.

The explanation provided me for not fencing water developments, creating mini-riparian zones, and providing troughs for livestock water is not only illogical, it completely strips the "multiple" from the "concept."



Jim Cagney Pg. 4

14

BLM explained to me; if proposed pasture fencing takes place, cooperative agreements for ranchers to maintain the fence-lines would be negotiated. But fencing around water developments would be a pain-in-the-neck to maintain and BLM's wildlife biologists are already swamped with duties. 14.11

Since the taxpayer will pick up a large portion of the tab for fencing, water development, healing the land, why not ask around - take a poll - and determine if the landlords would favor enhancing water development for communities of wildlife as well as for livestock. Of course, the answer is obvious.

The proposed riparian exclosures are merely tiny show-and-tell areas that, as BLM has noted, will show ranchers how these areas can flourish if given some protection. 14.12

We do not need more show-and-tell areas! We already know that riparian zones that still retain a spark-of-life will respond quickly if afforded protection and perhaps, given some help by beavers and willow planting. Shute's study noted that destruction of riparian areas in the DEIS area represents an annual loss of some 7,400 AUMs, not to mention the loss of entire communities of wildlife and fisheries.

Ranchers who are not aware of the recuperative powers of riparian areas should take a look at Bone Draw ~~Pas~~ the Big Sandy River. Other exclosures along the Sandy have not fared as well as has Bone Draw. Ranchers, noting that forage inside the exclosures was quite lush, opened gates, cut fences, and turned their stock in. And poorly designed stock barriers across the river allowed sheep to wander in. The small minority of ranchers who simply cannot stand by and watch an area be enhanced for wildlife without their livestock getting in on the act, surely give the rest of this industry a black-eye.

Under BLM's proposed action, few, if any riparian areas would be restored in our lifetime. But given some protection with fencing and proper livestock management, these areas could begin producing forage for controlled livestock grazing within a few years, and certainly, wildlife and fisheries would benefit greatly.

We support the "Emphasize Watershed, Wildlife Habitat and Soil Stability" alternative. Included in the alternative should be restoration of riparian zones. As noted earlier, if you do not stem the loss of soil, then wildlife/livestock issues become a moot-point because both will suffer equally.

Although this alternative emphasizes wildlife habitat, in the long run livestock would reap immense benefits from this most logical course of action, that of restoring the land.

Thank you for inviting our comments on this important DEIS.

Dick Randall
Great Basin representative
Defenders of Wildlife
Box 507
Rock Springs, Wyoming 82901

14.3 Pasture fences are not solely for the benefit of livestock. We are proposing to manage livestock in a manner which would accommodate the physiological requirements of the plants upon which both livestock and wildlife depend. The proposed management is based on the assumption that livestock will continue to be a major environmental influence.

14.4 Since the current utilization of many preferred grazing sites is already at or near the maximum that is physically possible, increased use of these areas is unlikely. The proposed management would give those areas the occasional rest they require in order to recover.

14.5 The majority of the allotments designated for range improvements are made up of livestock and wildlife summer range. No water developments are proposed on the winter ranges within the checkerboard, and no water developments are planned in identified critical or crucial winter range. We will continue to coordinate all projects on a case-by-case basis with the Wyoming Game and Fish Department.

14.6 Mitigation Measure No. 8, page 110 of Volume 1, would allow the fencing of waters to allow riparian development if acceptable maintenance arrangements could be made. Maintenance of numerous small riparian fences is beyond the capability of the Bureau, under the provisions of the Range ImprovementPolicy. These fences cannot be readily assigned to livestock operators who are not the primary beneficiaries of the project. Therefore the Bureau is currently seeking cooperators who would assist in the construction and maintenance of fences for the protection of key riparian areas.

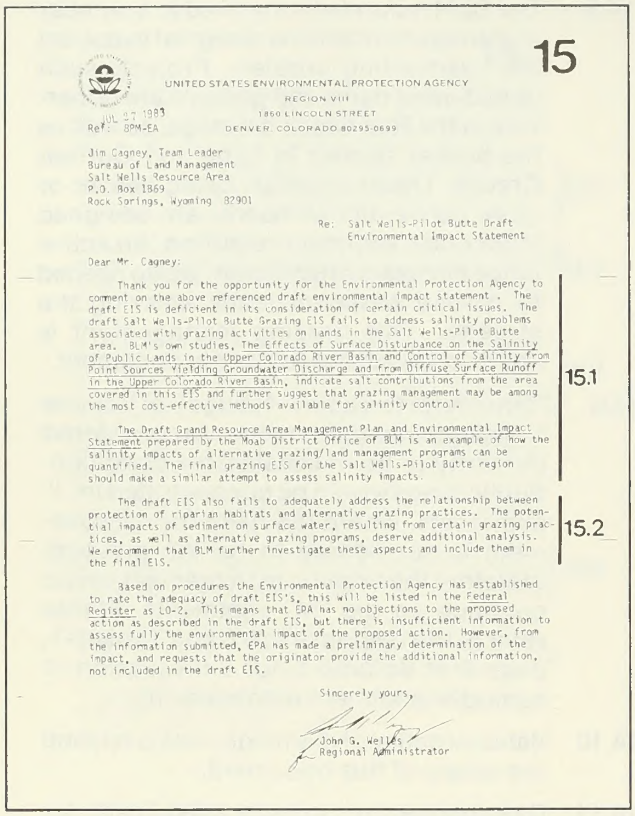
14.7 Don Shute's eye-opening paper on the decrease of riparian habitat was prepared for the Wyoming Natural Heritage Program. While Mr. Shute plainly states that over-utilization of riparian ecosystems is the probable source of the current downward trend, he acknowledges that headcutting did occur under presettlement conditions.

14.8 The BLM is currently involved in a number of management actions designed to correct the headcutting problem. Projects such as sediment dams and gabions are underway in the Red Creek drainage, as well as the beaver studies in Sage and Currant Creeks. These projects, using beaver or more conventional means, are designed to increase sediment retention. An active range management program is also needed to reduce sediment loads entering the streams. This grazing management is specifically addressed in the document.

14.9 Please refer to Table 1-1, page 6 of Volume 1. Maintenance allotments are considered currently to be in satisfactory condition. Public funds would be concentrated in "I" allotments, where the need for improvement is considered to be the greatest; therefore the existing management would continue on the "M" allotments. Please refer to the response to 9.8 and Table 1-1, page 6 of Volume 1, for a discussion of custodial allotment management.

14.10 National policy of this magnitude is beyond the scope of this document.

14.11 Development of projects specifically for wildlife is addressed in a habitat management plan (HMP), which is not within the scope of this EIS. This document is designed to portray the alternatives available with respect to livestock management, and the expected environmental consequences each alternative would entail. Since livestock and wildlife are dependent upon the same basic natural resources, the impacts to wildilife are essential elements in the environmental consequences section. However, the proposals contained in the document relate strictly to livestock management. Information concerning the development of HMPs is available at the local BLM offices.



15

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295-0699

JUL 27 1983

Ref: 8PM-EA

Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
P.O. Box 1869
Rock Springs, Wyoming 82901

Re: Salt Wells-Pilot Butte Draft
Environmental Impact Statement

Dear Mr. Cagney:

Thank you for the opportunity for the Environmental Protection Agency to comment on the above referenced draft environmental impact statement. The draft EIS is deficient in its consideration of certain critical issues. The draft Salt Wells-Pilot Butte Grazing EIS fails to address salinity problems associated with grazing activities on lands in the Salt Wells-Pilot Butte area. BLM's own studies, The Effects of Surface Disturbance on the Salinity of Public Lands in the Upper Colorado River Basin and Control of Salinity from Point Sources Yielding Groundwater Discharge and from Diffuse Surface Runoff in the Upper Colorado River Basin, indicate salt contributions from the area covered in this EIS and further suggest that grazing management may be among the most cost-effective methods available for salinity control. 15.1

The Draft Grand Resource Area Management Plan and Environmental Impact Statement prepared by the Moab District Office of BLM is an example of how the salinity impacts of alternative grazing/land management programs can be quantified. The final grazing EIS for the Salt Wells-Pilot Butte region should make a similar attempt to assess salinity impacts.

The draft EIS also fails to adequately address the relationship between protection of riparian habitats and alternative grazing practices. The potential impacts of sediment on surface water, resulting from certain grazing practices, as well as alternative grazing programs, deserve additional analysis. We recommend that BLM further investigate these aspects and include them in the final EIS. 15.2

Based on procedures the Environmental Protection Agency has established to rate the adequacy of draft EIS's, this will be listed in the Federal Register as LO-2. This means that EPA has no objections to the proposed action as described in the draft EIS, but there is insufficient information to assess fully the environmental impact of the proposed action. However, from the information submitted, EPA has made a preliminary determination of the impact, and requests that the originator provide the additional information, not included in the draft EIS.

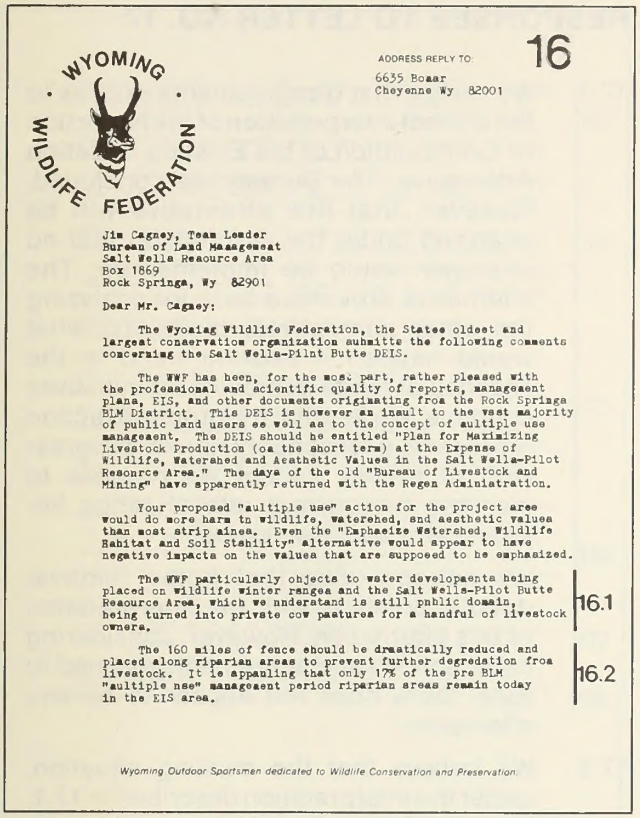
Sincerely yours,

John G. Welles
Regional Administrator

RESPONSES TO LETTER NO. 15

15.1 Salinity is a subfunction of sedimentation, which is addressed in the document. We realize the EIS lacks specific hard data on sediment reduction, but a comparative analysis of alternatives is portrayed in Figure 2-4, page 55 of Volume 1. Increased vegetative cover is the key to reduced sedimentation. We were aware that it would have been preferable to discuss sedimentation as a quantified variable, but we do not have sufficient data upon which a satisfactory quantified analysis can be based. We have contacted the Moab District Office. Their methodology for quantifying salinity uses data unavailable to the Rock Springs District. The course of action we have proposed should have a pronounced positive effect on sediment, and therefore salinity reduction, but we cannot predict exactly how much. We appreciate your assistance, and we will continue to gather better information concerning this important subject.

15.2 Protection of riparian areas is a focal point of the document. We have proposed extensive changes in livestock management to provide periodic rest from grazing in riparian areas. The relationship between the protection of riparian habitat and alternative grazing practices is addressed in the analysis of the different alternatives presented. The expected environmental consequences associated with the Proposed Action compared with those of the Continuation of the Existing Situation show a large variance in the degree of riparian protection provided.



WYOMING WILDLIFE FEDERATION

ADDRESS REPLY TO:
6635 Boaar
Cheyenne Wy 82001

16

Jim Cagney, Team Lemder
Bureau of Land Maagemeat
Salt Wells Reaource Area
Box 1869
Rock Springs, Wy 82901

Dear Mr. Cagney:

The Wyoaiag Wildlife Federation, the Statee oldeat and largeat conaervatiom organization auhmitte the following comments concerning the Salt Wells-Pilnt Butte DEIS.

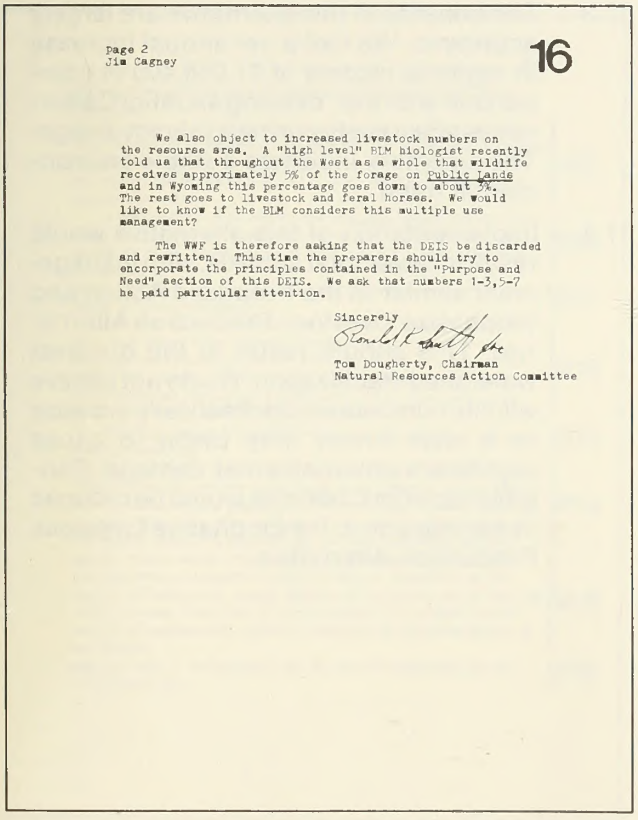
The WWF has heen, for the mos. part, rather pleased with the profeaaiomal and acientific quality of reports, manageaent plans, EIS, and other documents originating froa the Rock Springs BLM District. This DEIS is however an insult to the vast majority of public land users se well aa to the concept of aultiple use manageaent. The DEIS should he entitled "Plan for Maximizing Livestock Production (oa the ahort term) at the Expense of Wildlife, Waterahed and Aesthetic Valuea in the Salt Wells-Pilot Reaonrce Area." The daya of the old "Bureau of Livestock and Mining" have apparently returned with the Regen Adminiatration.

Your nroposed "aultiple use" action for the project area would do more harm tn wildlife, waterehed, snd aesthetic valuea than most atrip ainea. Even the "Emphaeize Wstershed, Wildlife Habitat and Soil Stahility" alternative would appear to have negative impacta on the valuea that are suppoeed to he emphasized.

The WWF particularly objects to water developaents heing placed on wildlife winter rangea and the Salt Wells-Pilot Butte Reaource Area, which we nnderatand is still pnblic domain, heing turned into privste cow paaturea for a handful of livestock owners. 16.1

The 160 miles of fence ehould be draatically reduced and placed along riparian areas to prevent further degredation froa livestock. It is appauling that only 17% of the pre BLM "aultiple nse" manageaent period riparian areas remain today in the EIS area. 16.2

Wyoming Outdoor Sportsmen dedicated to Wildlife Conservation and Preservation.



Page 2
Jim Cagney

16

We also object to increased livestock numbers on the resourse area. A "high level" BLM hiologist recently told ua that throughout the West as a whole that wildlife receives approximately 5% of the forage on Public Lands and in Wyoming this percentage goes down to about 3%. The rest goes to livestock and feral horses. We would like to know if the BLM considers this aultiple use management?

The WWF is therefore aaking that the DEIS be discarded and rewritten. This time the preparers ehould try to encorporate the principles contained in the "Purpose and Need" aection of this DEIS. We ask that numbers 1-3,5-7 he paid particular attention.

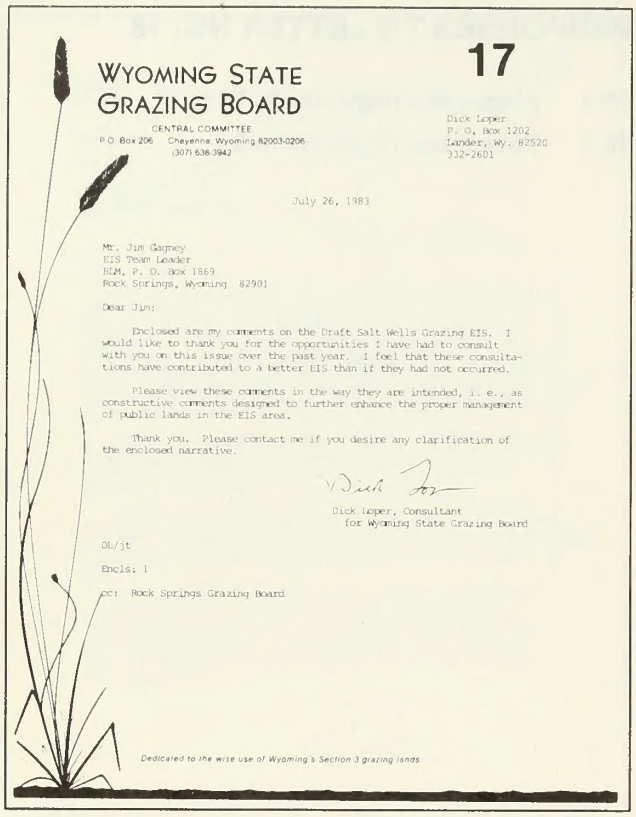
Sincerely

Tom Dougherty, Chairman
Natural Resources Action Committee

RESPONSES TO LETTER NO. 16

16.1 Please see response to 14.5.

16.2 Please see response to 9.7.



17

WYOMING STATE
GRAZING BOARD

CENTRAL COMMITTEE
P.O. Box 206 Cheyenne, Wyoming 82003-0206
(307) 638-3942

Dick Loper
P. O. Box 1202
Lander, Wy. 82520
332-2601

July 26, 1983

Mr. Jim Gagney
EIS Team Leader
BLM, P. O. Box 1869
Rock Springs, Wyoming 82901

Dear Jim:

Enclosed are my comments on the Draft Salt Wells Grazing EIS. I would like to thank you for the opportunities I have had to consult with you on this issue over the past year. I feel that these consultations have contributed to a better EIS than if they had not occurred.

Please view these comments in the way they are intended, i. e., as constructive comments designed to further enhance the proper management of public lands in the EIS area.

Thank you. Please contact me if you desire any clarification of the enclosed narrative.

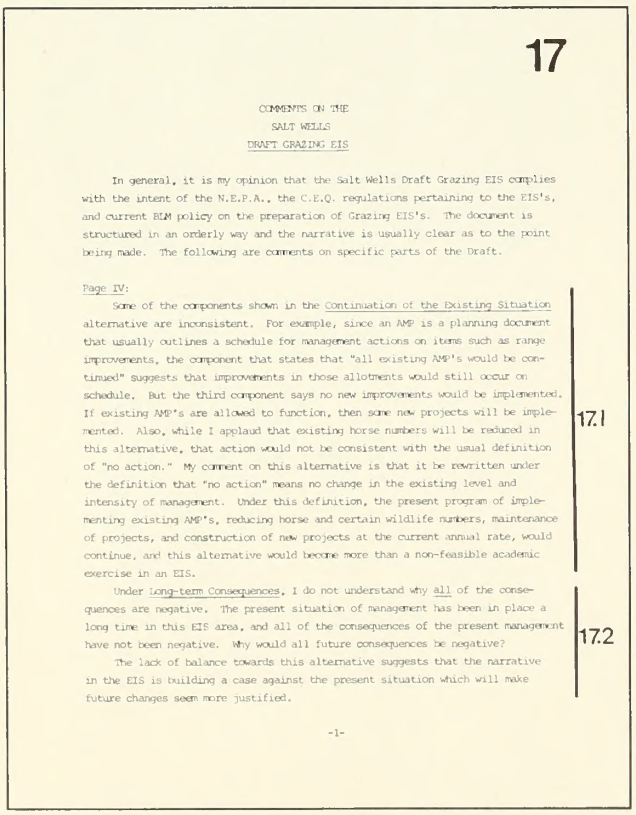
Dick Loper, Consultant
for Wyoming State Grazing Board

DL/jt

Encls: 1

cc: Rock Springs Grazing Board

Dedicated to the wise use of Wyoming's Section 3 grazing lands



17

COMMENTS ON THE
SALT WELLS
DRAFT GRAZING EIS

In general, it is my opinion that the Salt Wells Draft Grazing EIS complies with the intent of the N.E.P.A., the C.E.Q. regulations pertaining to the EIS's, and current BLM policy on the preparation of Grazing EIS's. The document is structured in an orderly way and the narrative is usually clear as to the point being made. The following are comments on specific parts of the Draft.

Page IV:

Some of the components shown in the Continuation of the Existing Situation alternative are inconsistent. For example, since an AMP is a planning document that usually outlines a schedule for management actions on items such as range improvements, the component that states that "all existing AMP's would be continued" suggests that improvements in those allotments would still occur on schedule. But the third component says no new improvements would be implemented. If existing AMP's are allowed to function, then some new projects will be implemented. Also, while I applaud that existing horse numbers will be reduced in this alternative, that action would not be consistent with the usual definition of "no action." My comment on this alternative is that it be rewritten under the definition that "no action" means no change in the existing level and intensity of management. Under this definition, the present program of implementing existing AMP's, reducing horse and certain wildlife numbers, maintenance of projects, and construction of new projects at the current annual rate, would continue, and this alternative would become more than a non-feasible academic exercise in an EIS. 17.1

Under Long-term Consequences, I do not understand why all of the consequences are negative. The present situation of management has been in place a long time in this EIS area, and all of the consequences of the present management have not been negative. Why would all future consequences be negative? 17.2

The lack of balance towards this alternative suggests that the narrative in the EIS is building a case against the present situation which will make future changes seem more justified.

-1-

RESPONSES TO LETTER NO. 17

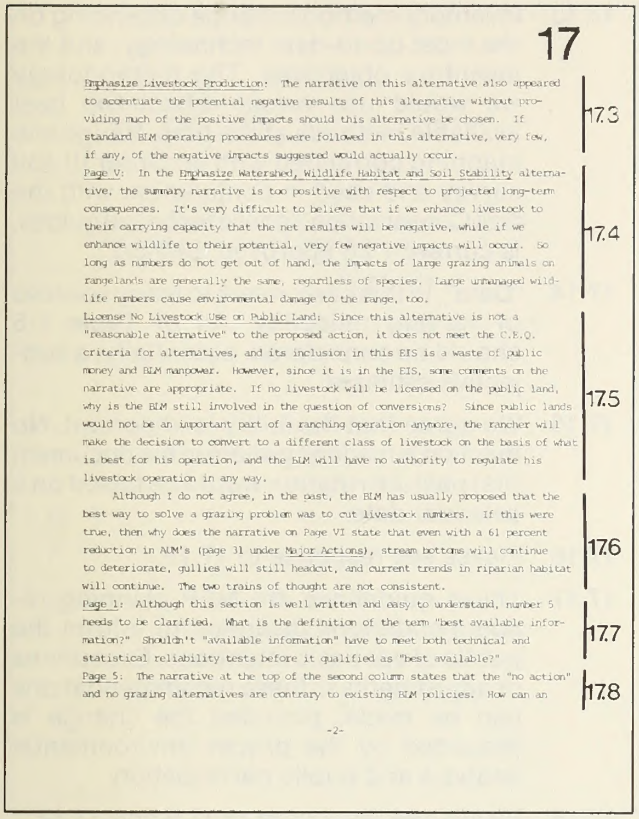
17.1 We realize that disagreements exist as to the correct interpretation of the No Action or Continuation of the Existing Situation Alternative. The Bureau has concluded, however, that this alternative will be analyzed under the assumption that no changes would be implemented. The alternative provides a base for analyzing the other alternatives, projecting what would happen if existing trend in the absence of range improvement initiatives continue. We feel that the proposed action represents a reasonably normal progression of events, except we propose to increase the current rate of range improvement and development.

We acknowledge that horse removal directly conflicts with the interpretation of this alternative. However, considering court actions and agreements reached to date, there does not appear to be any alternative.

17.2 We believe that the existing situation, under the interpretation described in 17.1, would indeed yield negative results; most specifically, the continued deterioration of preferred sites including riparian areas, due in large part to poor cattle distribution.

17.3 The benefits of this alternative are largely economic. We feel a net annual increase in regional income of $1,058,400 in comparison with the "existing situation" alternative adequately portrays this advantage. The summary indicates a stable environmental trend.

17.4 Implementation of this alternative would result in fewer total animals, with management similar to the Proposed Action and Emphasize Livestock Production Alternative. This should result in the quickest watershed stabilization. We do not believe wildlife numbers would drastically increase to a level where they begin to cause significant environmental damage. Tangible economic benefits would be reduced in comparison to the Emphasize Livestock Production Alternative.



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Emphasize Livestock Production: The narrative on this alternative also appeared to accentuate the potential negative results of this alternative without providing much of the positive impacts should this alternative be chosen. If standard BLM operating procedures were followed in this alternative, very few, if any, of the negative impacts suggested would actually occur. 17.3

Page V: In the Emphasize Watershed, Wildlife Habitat and Soil Stability alternative, the summary narrative is too positive with respect to projected long-term consequences. It's very difficult to believe that if we enhance livestock to their carrying capacity that the net results will be negative, while if we enhance wildlife to their potential, very few negative impacts will occur. So long as numbers do not get out of hand, the impacts of large grazing animals on rangelands are generally the same, regardless of species. Large unmanaged wildlife numbers cause environmental damage to the range, too. 17.4

License No Livestock Use on Public Land: Since this alternative is not a "reasonable alternative" to the proposed action, it does not meet the C.E.Q. criteria for alternatives, and its inclusion in this EIS is a waste of public money and BLM manpower. However, since it is in the EIS, some comments on the narrative are appropriate. If no livestock will be licensed on the public land, why is the BLM still involved in the question of conversions? Since public lands would not be an important part of a ranching operation anymore, the rancher will make the decision to convert to a different class of livestock on the basis of what is best for his operation, and the BLM will have no authority to regulate his livestock operation in any way. 17.5

Although I do not agree, in the east, the BLM has usually proposed that the best way to solve a grazing problem was to cut livestock numbers. If this were true, then why does the narrative on Page VI state that even with a 61 percent reduction in AUM's (page 31 under Major Actions), stream bottoms will continue to deteriorate, gullies will still headcut, and current trends in riparian habitat will continue. The two trains of thought are not consistent. 17.6

Page 1: Although this section is well written and easy to understand, number 5 needs to be clarified. What is the definition of the term "best available information?" Shouldn't "available information" have to meet both technical and statistical reliability tests before it qualified as "best available?" 17.7

Page 5: The narrative at the top of the second column states that the "no action" and no grazing alternatives are contrary to existing BLM policies. How can an 17.8

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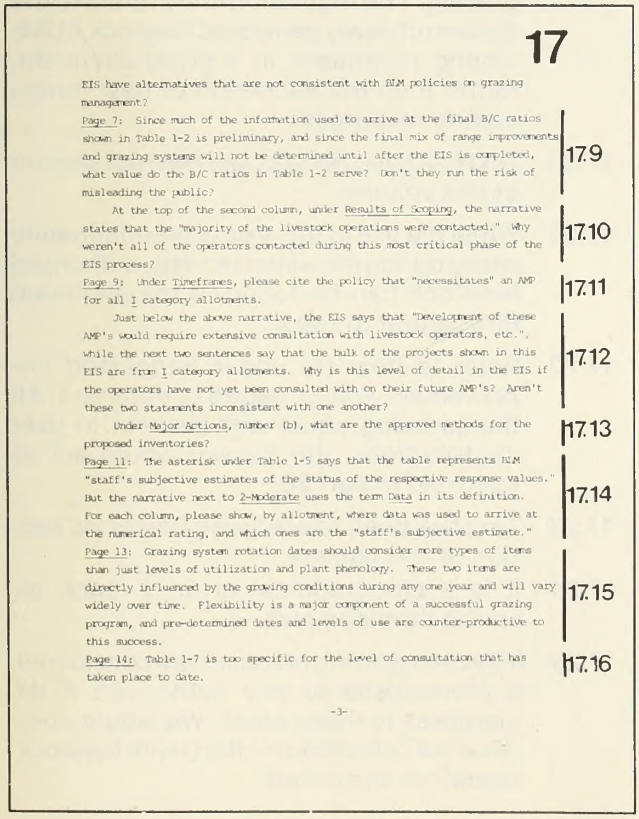

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EIS have alternatives that are not consistent with BLM policies on grazing management?

Page 7: Since much of the information used to arrive at the final B/C ratios shown in Table 1-2 is preliminary, and since the final mix of range improvements and grazing systems will not be determined until after the EIS is completed, what value do the B/C ratios in Table 1-2 serve? Don't they run the risk of misleading the public? 17.9

At the top of the second column, under Results of Scoping, the narrative states that the "majority of the livestock operations were contacted." Why weren't all of the operators contacted during this most critical phase of the EIS process? 17.10

Page 9: Under Timeframes, please cite the policy that "necessitates" an AMP for all I category allotments. 17.11

Just below the above narrative, the EIS says that "Development of these AMP's would require extensive consultation with livestock operators, etc.", while the next two sentences say that the bulk of the projects shown in this EIS are from I category allotments. Why is this level of detail in the EIS if the operators have not yet been consulted with on their future AMP's? Aren't these two statements inconsistent with one another? 17.12

Under Major Actions, number (b), what are the approved methods for the proposed inventories? 17.13

Page 11: The asterisk under Table 1-5 says that the table represents BLM "staff's subjective estimates of the status of the respective response values." But the narrative next to 2-Moderate uses the term Data in its definition. For each column, please show, by allotment, where data was used to arrive at the numerical rating, and which ones are the "staff's subjective estimate." 17.14

Page 13: Grazing system rotation dates should consider more types of items than just levels of utilization and plant phenology. These two items are directly influenced by the growing conditions during any one year and will vary widely over time. Flexibility is a major component of a successful grazing program, and pre-determined dates and levels of use are counter-productive to this success. 17.15

Page 14: Table 1-7 is too specific for the level of consultation that has taken place to date. 17.16

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17.5 This alternative analyzes the lowest feasible grazing level, which provides a valuable comparison with other alternatives. The Bureau would be involved in conversions only if the operator elected to use the option of running the stocking rate of his private and State holdings over the entire allotment acreage as described in the alternative. Should an operator opt to confine his animals to privately controlled acreage, we would not be involved with the livestock operation in any way.

17.6 Please refer to page 60 of Volume 1. Given the current livestock distribution problems, 39 percent of the existing stocking rate would probably be sufficient to continue the overuse of many preferred sites. This would be accompanied by a significant decrease in utilization of other areas. The degree to which this scenario would occur is entirely dependent upon the percentage of private AUMs in a given allotment.

17.7 Since the question of technical and statistical reliability is often subject to divergent opinion, the decisionmaker often has no choice but to use the information he/she considers the best available.

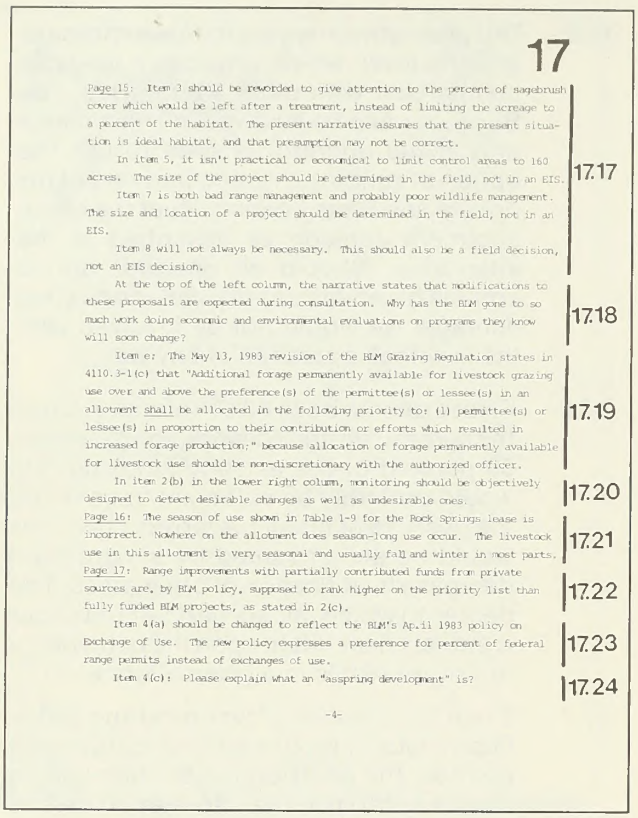
17.8 Please see the responses to 17.1 and 17.5.

17.9 The B/C ratios shown in Table 1-2 were used to provide an adeqauate comparison of the relative economic efficiencies of the alternatives. Therefore we believe the public is better informed as to the potential returns from the rangeland investments. Other B/C analyses will be conducted before the project mix is finalized.

17.10 Text has been revised; see Revisions section of this volume.

17.11 Text has been revised; see Revisions section of this volume.

17.12 We believe it is our responsibility to initiate the consultation process by presenting a proposal. The Bureau has and will continue to consult with the livestock operators, and others, throughout the development of the range management program. The information in this document reflects the best ideas we have to date concerning the protection and development of the public lands.



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Page 15: Item 3 should be reworded to give attention to the percent of sagebrush cover which would be left after a treatment, instead of limiting the acreage to a percent of the habitat. The present narrative assumes that the present situation is ideal habitat, and that presumption may not be correct.

In item 5, it isn't practical or economical to limit control areas to 160 acres. The size of the project should be determined in the field, not in an EIS. 17.17

Item 7 is both bad range management and probably poor wildlife management. The size and location of a project should be determined in the field, not in an EIS.

Item 8 will not always be necessary. This should also be a field decision, not an EIS decision.

At the top of the left column, the narrative states that modifications to these proposals are expected during consultation. Why has the BLM gone to so much work doing economic and environmental evaluations on programs they know will soon change? 17.18

Item e: The May 13, 1983 revision of the BLM Grazing Regulation states in 4110.3-1(c) that "Additional forage permanently available for livestock grazing use over and above the preference(s) of the permittee(s) or lessee(s) in an allotment shall be allocated in the following priority to: (1) permittee(s) or lessee(s) in proportion to their contribution or efforts which resulted in increased forage production;" because allocation of forage permanently available for livestock use should be non-discretionary with the authorized officer. 17.19

In item 2(b) in the lower right column, monitoring should be objectively designed to detect desirable changes as well as undesirable ones. 17.20

Page 16: The season of use shown in Table 1-9 for the Rock Springs lease is incorrect. Nowhere on the allotment does season-long use occur. The livestock use in this allotment is very seasonal and usually fall and winter in most parts. 17.21

Page 17: Range improvements with partially contributed funds from private sources are, by BLM policy, supposed to rank higher on the priority list than fully funded BLM projects, as stated in 2(c). 17.22

Item 4(a) should be changed to reflect the BLM's Ap.il 1983 policy on Exchange of Use. The new policy expresses a preference for percent of federal range permits instead of exchanges of use. 17.23

Item 4(c): Please explain what an "asspring development" is? 17.24

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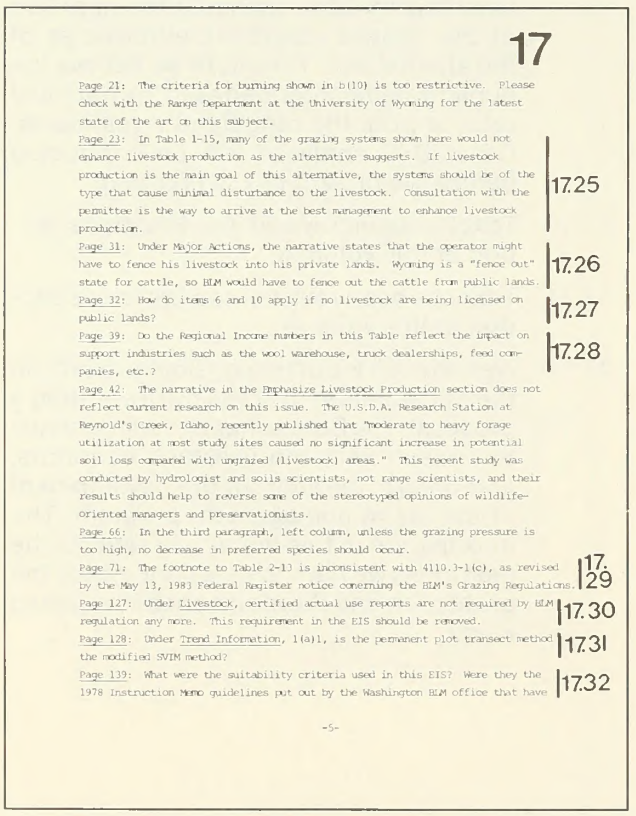

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Page 21: The criteria for burning shown in b(10) is too restrictive. Please check with the Range Department at the University of Wyoming for the latest state of the art on this subject.

Page 23: In Table 1-15, many of the grazing systems shown here would not enhance livestock production as the alternative suggests. If livestock production is the main goal of this alternative, the systems should be of the type that cause minimal disturbance to the livestock. Consultation with the permittee is the way to arrive at the best management to enhance livestock production. 17.25

Page 31: Under Major Actions, the narrative states that the operator might have to fence his livestock into his private lands. Wyoming is a "fence out" state for cattle, so BLM would have to fence out the cattle from public lands. 17.26

Page 32: How do items 6 and 10 apply if no livestock are being licensed on public lands? 17.27

Page 39: Do the Regional Income numbers in this Table reflect the impact on support industries such as the wool warehouse, truck dealerships, feed companies, etc.? 17.28

Page 42: The narrative in the Emphasize Livestock Production section does not reflect current research on this issue. The U.S.D.A. Research Station at Reynold's Creek, Idaho, recently published that "moderate to heavy forage utilization at most study sites caused no significant increase in potential soil loss compared with ungrazed (livestock) areas." This recent study was conducted by hydrologist and soils scientists, not range scientists, and their results should help to reverse some of the stereotyped opinions of wildlife-oriented managers and preservationists.

Page 66: In the third paragraph, left column, unless the grazing pressure is too high, no decrease in preferred species should occur.

Page 71: The footnote to Table 2-13 is inconsistent with 4110.3-1(c), as revised by the May 13, 1983 Federal Register notice concerning the BLM's Grazing Regulations. 17.29

Page 127: Under Livestock, certified actual use reports are not required by BLM regulation any more. This requirement in the EIS should be removed. 17.30

Page 128: Under Trend Information, 1(a)1, is the permanent plot transect method the modified SVIM method? 17.31

Page 139: What were the suitability criteria used in this EIS? Were they the 1978 Instruction Memo guidelines put out by the Washington BLM office that have 17.32

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17.13 Inventory methods change depending on the most up-to-date technology, and the inventory objectives. The methodology we would use would reflect the best available methods at the time. Range site mapping correlated with an Order III soil survey and used in conjunction with the Soil Conservation Service technical guides, is currently an approved method.

17.14 "Data", in this case, refers to many sources of varying reliability. All of Table 1-5 should be considered, essentially, a subjective estimate.

17.15 We agree that flexibility is important. No mention is made anywhere in the document that pasture rotation would be based on a calendar date.

17.16 Please see response to 17.12.

17.17 These guidelines are MFP planning recommendations designed to inform the public of our basic intentions. Exceptions or adjustments to these recommendations can be made, provided the change is preceded by the proper environmental analysis and public participation.

17.18 Please see responses to 17.9 and 17.12.

17.19 It is within the designated authority of the authorized officer to decide when forage is permanently available for livestock grazing. The regulation cited refers to the division of newly generated livestock AUMs among permittees in a given allotment, rather than the allocation of new forage among resources.

17.20 Text has been revised; see Revised section of this volume.

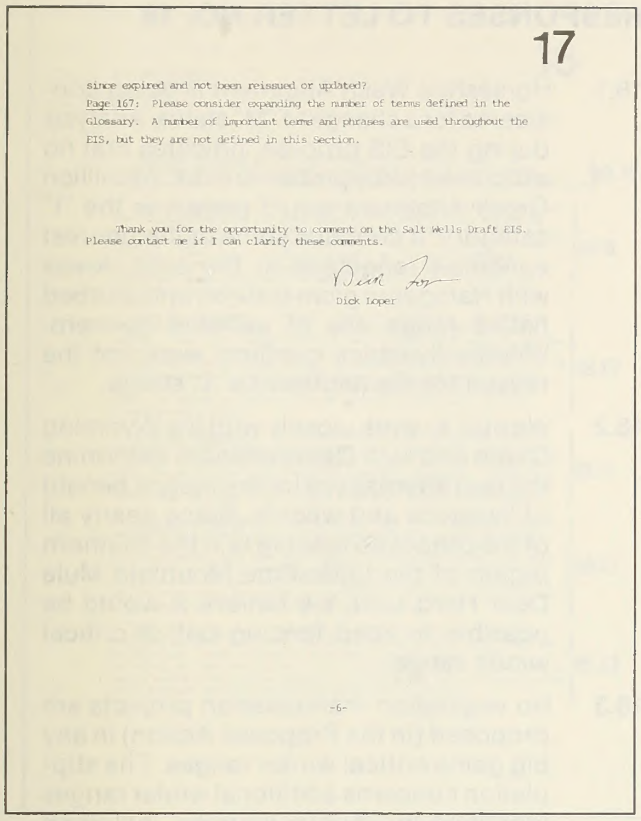
17.21 While the use in the area is predominantly sheep during the winter months, authorized livestock can be found in the allotment throughout the year.

17.22 Refer to item (5) under *Rangeland Improvement Policy*, page 5 of Volume 1. All things being equal with respect to user contributions, the Bureau would act as specified in part 2c.

17.23 Text has been revised; see Revisions section of this volume.

17.24 It is a typographical error, (- such as spring developments -).

17.25 Improved grazing practices are considered a prerequisite to any authorized AUM increases in these areas. We would continue our consultation efforts with livestock operators and others.



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since expired and not been reissued or updated?

Page 167: Please consider expanding the number of terms defined in the Glossary. A number of important terms and phrases are used throughout the EIS, but they are not defined in this Section.

Thank you for the opportunity to comment on the Salt Wells Draft EIS. Please contact me if I can clarify these comments.

Dick Loper

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17.26 This is a complicated legal question, which would no doubt be settled in the courts if this alternative were implemented in the field.

17.27 BLM involvement in conversions and range improvements is possible under this alternative. Please see response to 17.5 and please refer to item 3 on page 32.

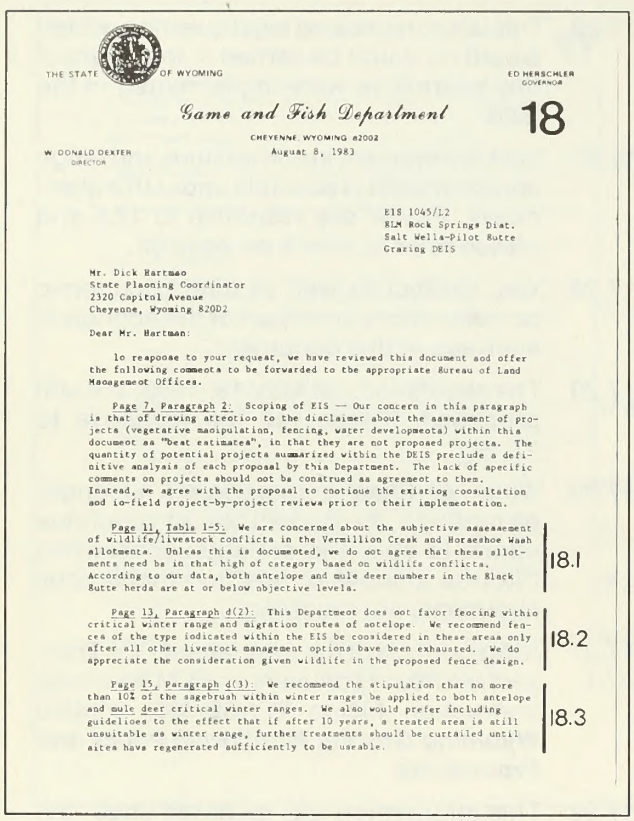
17.28 Yes, indirect as well as direct economic consequences were part of the economic analyses of this document.

17.29 The regulations of May 13, 1983, are still proposed. Please see the response to 17.19.

17.30 While "certified" actual use will no longer be required, the Bureau plans to continue efforts to obtain information concerning the true amount of use that the various allotments are receiving.

17.31 A description of the *Permanent Plot Transect Method* is contained in BLM Wyoming Instruction Memo WY-82-330, entitled ***Wyoming Grazing Monitoring Policy and Procedures***.

17.32 This information was gathered under the guidelines of the now expired 1978 instruction memo. The process involved extensive consultation with operators, map and data analyses, and field checks. We consider this to be valuable data, and we used it to good advantage in computing our estimates on the value of water development. Adjustments in livestockuse would be based on monitoring and not this suitability information.



THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Game and Fish Department

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CHEYENNE, WYOMING 82002

W. DONALD DEXTER
DIRECTOR

August 8, 1983

EIS 1045/12
BLM Rock Springs Dist.
Salt Wells-Pilot Butte
Grazing DEIS

Mr. Dick Hartman
State Planning Coordinator
2320 Capitol Avenue
Cheyenne, Wyoming 82002

Dear Mr. Hartman:

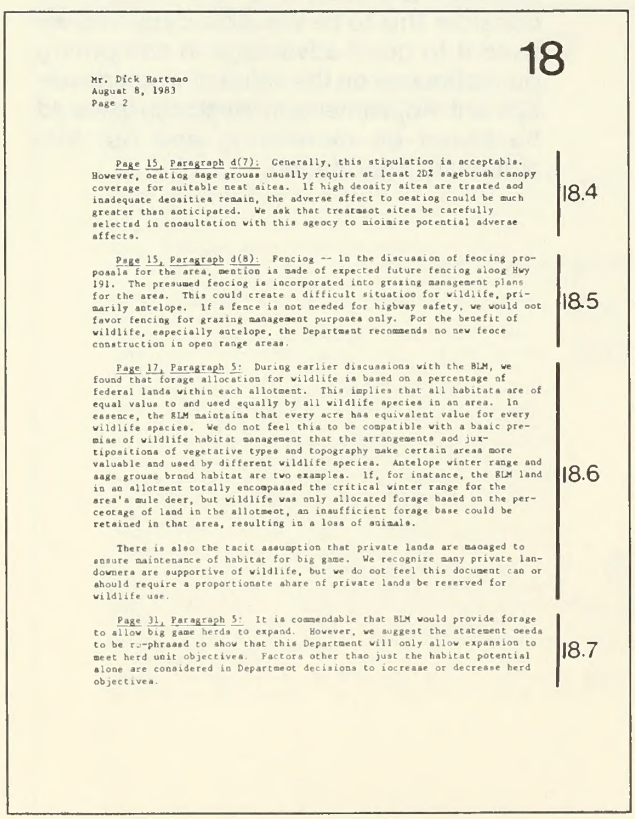
In response to your request, we have reviewed this document and offer the following comments to be forwarded to the appropriate Bureau of Land Management Offices.

Page 7, Paragraph 2: Scoping of EIS — Our concern in this paragraph is that of drawing attention to the disclaimer about the assessment of projects (vegetative manipulation, fencing, water developments) within this document as "best estimates", in that they are not proposed projects. The quantity of potential projects summarized within the DEIS preclude a definitive analysis of each proposal by this Department. The lack of specific comments on projects should not be construed as agreement to them. Instead, we agree with the proposal to continue the existing consultation and in-field project-by-project reviews prior to their implementation.

Page 11, Table 1-5: We are concerned about the subjective assessment of wildlife/livestock conflicts in the Vermillion Creek and Horseshoe Wash allotments. Unless this is documented, we do not agree that these allotments need be in that high of category based on wildlife conflicts. According to our data, both antelope and mule deer numbers in the Black Butte herds are at or below objective levels. 18.1

Page 13, Paragraph d(2): This Department does not favor fencing within critical winter range and migration routes of antelope. We recommend fences of the type indicated within the EIS be considered in these areas only after all other livestock management options have been exhausted. We do appreciate the consideration given wildlife in the proposed fence design. 18.2

Page 15, Paragraph d(3): We recommend the stipulation that no more than 10% of the sagebrush within winter ranges be applied to both antelope and mule deer critical winter ranges. We also would prefer including guidelines to the effect that if after 10 years, a treated area is still unsuitable as winter range, further treatments should be curtailed until sites have regenerated sufficiently to be useable. 18.3



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Page 15, Paragraph d(7): Generally, this stipulation is acceptable. However, nesting sage grouse usually require at least 20% sagebrush canopy coverage for suitable nest sites. If high density sites are treated and inadequate densities remain, the adverse affect to nesting could be much greater than anticipated. We ask that treatment sites be carefully selected in consultation with this agency to minimize potential adverse affects. 18.4

Page 15, Paragraph d(8): Fencing — In the discussion of fencing proposals for the area, mention is made of expected future fencing along Hwy 191. The presumed fencing is incorporated into grazing management plans for the area. This could create a difficult situation for wildlife, primarily antelope. If a fence is not needed for highway safety, we would not favor fencing for grazing management purposes only. For the benefit of wildlife, especially antelope, the Department recommends no new fence construction in open range areas. 18.5

Page 17, Paragraph 5: During earlier discussions with the BLM, we found that forage allocation for wildlife is based on a percentage of federal lands within each allotment. This implies that all habitats are of equal value to and used equally by all wildlife species in an area. In essence, the BLM maintains that every acre has equivalent value for every wildlife species. We do not feel this to be compatible with a basic premise of wildlife habitat management that the arrangements and juxtapositions of vegetative types and topography make certain areas more valuable and used by different wildlife species. Antelope winter range and sage grouse brood habitat are two examples. If, for instance, the BLM land in an allotment totally encompassed the critical winter range for the area's mule deer, but wildlife was only allocated forage based on the percentage of land in the allotment, an insufficient forage base could be retained in that area, resulting in a loss of animals.

There is also the tacit assumption that private lands are managed to ensure maintenance of habitat for big game. We recognize many private landowners are supportive of wildlife, but we do not feel this document can or should require a proportionate share of private lands be reserved for wildlife use. 18.6

Page 31, Paragraph 5: It is commendable that BLM would provide forage to allow big game herds to expand. However, we suggest the statement needs to be re-phrased to show that this Department will only allow expansion to meet herd unit objectives. Factors other than just the habitat potential alone are considered in Department decisions to increase or decrease herd objectives. 18.7

RESPONSES TO LETTER NO. 18

18.1 Horseshoe Wash Allotment is being considered for a change to "M" status. Analysis during the EIS process indicates that no serious resource problems exist. Vermillion Creek Allotment would remain in the "I" category; it contains some of the poorest condition rangeland in the area. Areas with *Halogeton glomerata* on undisturbed native range are of extreme concern. Wildlife-livestock conflicts were not the reason for the allotment's "I" status.

18.2 We plan to work closely with the Wyoming Game and Fish Department to determine the best alternatives for the mutual benefit of livestock and wildlife. Since nearly all of the proposed fencing is in the southern region of the Little-Pine Mountain Mule Deer Herd Unit, we believe it would be possible to keep fencing out of critical winter range.

18.3 No vegetation manipulation projects are proposed (in the Proposed Action) in any big game critical winter ranges. The stipulation concerns additional winter ranges identified by various sources, including BLM wildlife biologists.

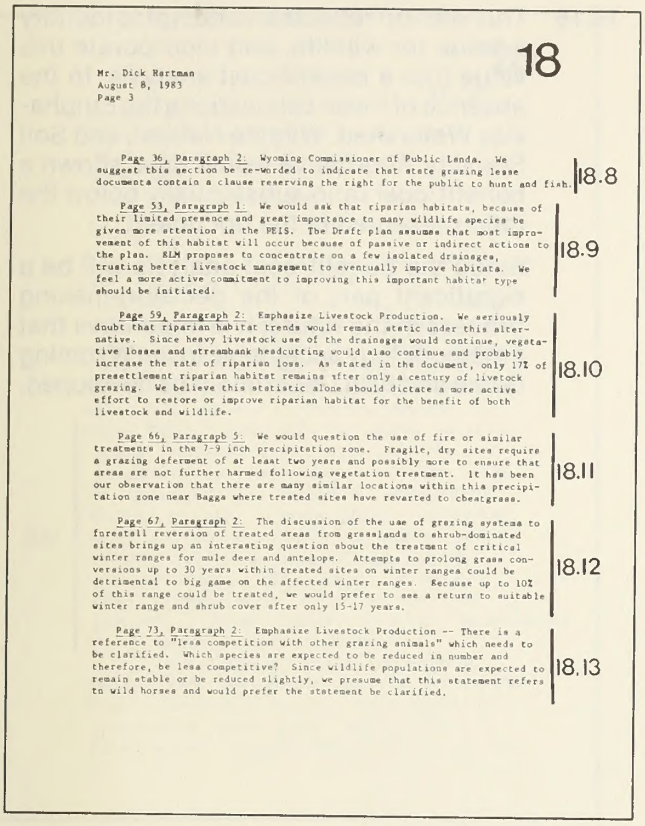
18.4 This concern will be addressed as part of the site-specific analysis, prior to implementation.

18.5 Allotment management plans cannot be developed in a responsible manner while the right-of-way status of Highway 191 remains a variable. Since we believe this road will eventually be fenced, we are acting accordingly.

18.6 The paragraph is intended to specifically state that habitat on federal land alone is not sufficient to carry the entire Wyoming Game and Fish Department's strategic plan populations. We understand variation in habitat, but believe it is reasonable to assume that wildlife are dependent on Federal, private, and State lands in a manner which reflects each area's productivity. The percentages in Table 1-13 are a function of forage produced, based on our range surveys—not acreage.

This analysis is concerned with unfenced private lands which are managed in a manner identical to adjacent public lands. Fenced private lands are not considered.

18.7 Text has been revised; see Revisions section.



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Page 36, Paragraph 2: Wyoming Commissioner of Public Lands. We suggest this section be re-worded to indicate that state grazing lease documents contain a clause reserving the right for the public to hunt and fish. 18.8

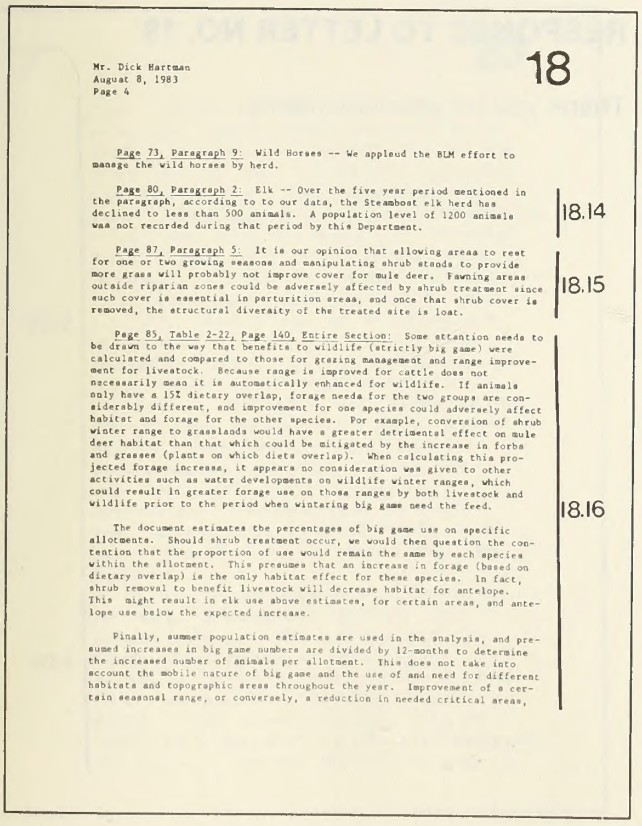
Page 53, Paragraph 1: We would ask that riparian habitats, because of their limited presence and great importance to many wildlife species be given more attention in the PEIS. The Draft plan assumes that most improvement of this habitat will occur because of passive or indirect actions to the plan. BLM proposes to concentrate on a few isolated drainages, trusting better livestock management to eventually improve habitats. We feel a more active commitment to improving this important habitat type should be initiated. 18.9

Page 59, Paragraph 2: Emphasize Livestock Production. We seriously doubt that riparian habitat trends would remain static under this alternative. Since heavy livestock use of the drainages would continue, vegetative losses and streambank headcutting would also continue and probably increase the rate of riparian loss. As stated in the document, only 17% of presettlement riparian habitat remains after only a century of livestock grazing. We believe this statistic alone should dictate a more active effort to restore or improve riparian habitat for the benefit of both livestock and wildlife. 18.10

Page 66, Paragraph 5: We would question the use of fire or similar treatments in the 7-9 inch precipitation zone. Fragile, dry sites require a grazing deferment of at least two years and possibly more to ensure that areas are not further harmed following vegetation treatment. It has been our observation that there are many similar locations within this precipitation zone near Bagga where treated sites have reverted to cheatgrass. 18.11

Page 67, Paragraph 2: The discussion of the use of grazing systems to forestall reversion of treated areas from grasslands to shrub-dominated sites brings up an interesting question about the treatment of critical winter ranges for mule deer and antelope. Attempts to prolong grass conversions up to 30 years within treated sites on winter ranges could be detrimental to big game on the affected winter ranges. Because up to 10% of this range could be treated, we would prefer to see a return to suitable winter range and shrub cover after only 15-17 years. 18.12

Page 73, Paragraph 2: Emphasize Livestock Production -- There is a reference to "less competition with other grazing animals" which needs to be clarified. Which species are expected to be reduced in number and therefore, be less competitive? Since wildlife populations are expected to remain stable or be reduced slightly, we presume that this statement refers to wild horses and would prefer the statement be clarified. 18.13



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Page 73, Paragraph 9: Wild Horses -- We applaud the BLM effort to manage the wild horses by herd.

Page 80, Paragraph 2: Elk -- Over the five year period mentioned in the paragraph, according to to our data, the Steamboat elk herd has declined to less than 500 animals. A population level of 1200 animals was not recorded during that period by this Department. 18.14

Page 87, Paragraph 5: It is our opinion that allowing areas to rest for one or two growing seasons and manipulating shrub stands to provide more grass will probably not improve cover for mule deer. Fawning areas outside riparian zones could be adversely affected by shrub treatment since such cover is essential in parturition areas, and once that shrub cover is removed, the structural diversity of the treated site is lost. 18.15

Page 85, Table 2-22, Page 140, Entire Section: Some attention needs to be drawn to the way that benefits to wildlife (strictly big game) were calculated and compared to those for grazing management and range improvement for livestock. Because range is improved for cattle does not necessarily mean it is automatically enhanced for wildlife. If animals only have a 15% dietary overlap, forage needs for the two groups are considerably different, and improvement for one species could adversely affect habitat and forage for the other species. For example, conversion of shrub winter range to grasslands would have a greater detrimental effect on mule deer habitat than that which could be mitigated by the increase in forbs and grasses (plants on which diets overlap). When calculating this projected forage increase, it appears no consideration was given to other activities such as water developments on wildlife winter ranges, which could result in greater forage use on those ranges by both livestock and wildlife prior to the period when wintering big game need the feed. 18.16

The document estimates the percentages of big game use on specific allotments. Should shrub treatment occur, we would then question the contention that the proportion of use would remain the same by each species within the allotment. This presumes that an increase in forage (based on dietary overlap) is the only habitat effect for these species. In fact, shrub removal to benefit livestock will decrease habitat for antelope. This might result in elk use above estimates, for certain areas, and antelope use below the expected increase.

Finally, summer population estimates are used in the analysis, and presumed increases in big game numbers are divided by 12-months to determine the increased number of animals per allotment. This does not take into account the mobile nature of big game and the use of and need for different habitats and topographic areas throughout the year. Improvement of a certain seasonal range, or conversely, a reduction in needed critical areas,

18.8 Text has been revised; see Revisions section.

18.9 Better livestock management which would provide for the physiological needs of riparian plants is the main objective of the proposed action. Projects such as gabions, headcut control structures, and beaver introduction projects would be a function of Habitat Management Plans or Watershed Management Plans, which are beyond the scope of this document. Please see responses to 9.4, 14.8, and 14.11.

18.10 The Emphasize Livestock Production Alternative includes a significant change in the livestock use pattern. By concentrating livestock in one area while resting another, the current trend in riparian habitat can be reversed. Please see response to 6.2 and please refer to Appendix G of Volume 1.

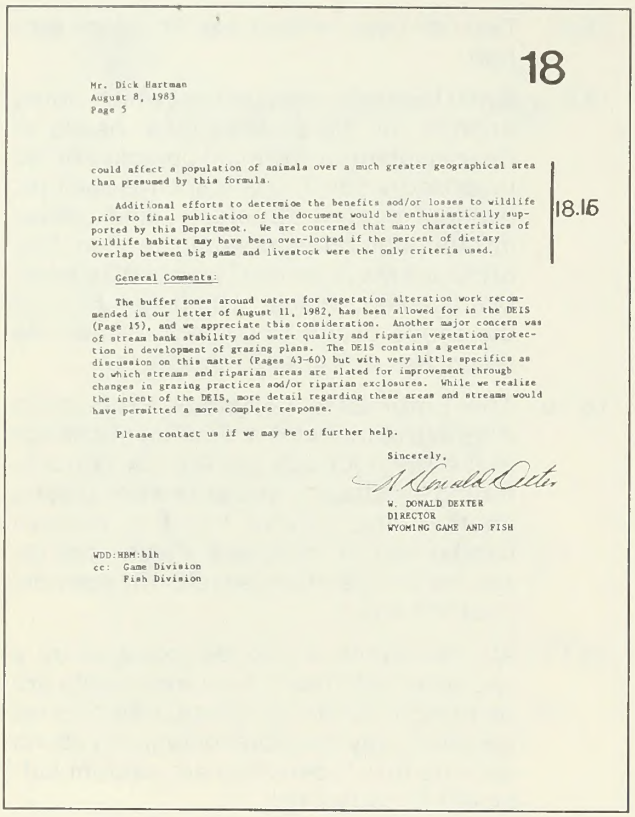
18.11 All treatments would be followed by a two-year deferment. Few treatments are planned in 7 to 9-inch precipitation zones because sprays are not economically sound and the brush densities are seldom sufficient to carry a fire.

18.12 Please see response to 18.3. The assumption used in preparing the document assumes the range will be in good condition for 30 years following a treatment. By the SCS range site guide, good condition on a loamy site can contain up to 35 percent sagebrush and remain in good condition provided the other plants are part of the climax community. See Appendix D, Methodology, for how the Bureau computed range condition.

18.13 Text has been revised; see Revisions section.

18.14 Text has been revised; see Revisions section.

18.15 We are not planning vegetation conversions in sagebrush to a degree in which a lack of sagebrush could reasonably become a limiting factor for mule deer. The paragraph refers to improved cover in riparian areas.



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could affect a population of animals over a much greater geographical area than presumed by this formula.

Additional efforts to determine the benefits and/or losses to wildlife prior to final publication of the document would be enthusiastically supported by this Department. We are concerned that many characteristics of wildlife habitat may have been over-looked if the percent of dietary overlap between big game and livestock were the only criteria used. 18.16

General Comments:

The buffer zones around waters for vegetation alteration work recommended in our letter of August 11, 1982, has been allowed for in the DEIS (Page 15), and we appreciate this consideration. Another major concern was of stream bank stability and water quality and riparian vegetation protection in development of grazing plans. The DEIS contains a general discussion on this matter (Pages 43-60) but with very little specifics as to which streams and riparian areas are slated for improvement through changes in grazing practices and/or riparian exclosures. While we realize the intent of the DEIS, more detail regarding these areas and streams would have permitted a more complete response.

Please contact us if we may be of further help.

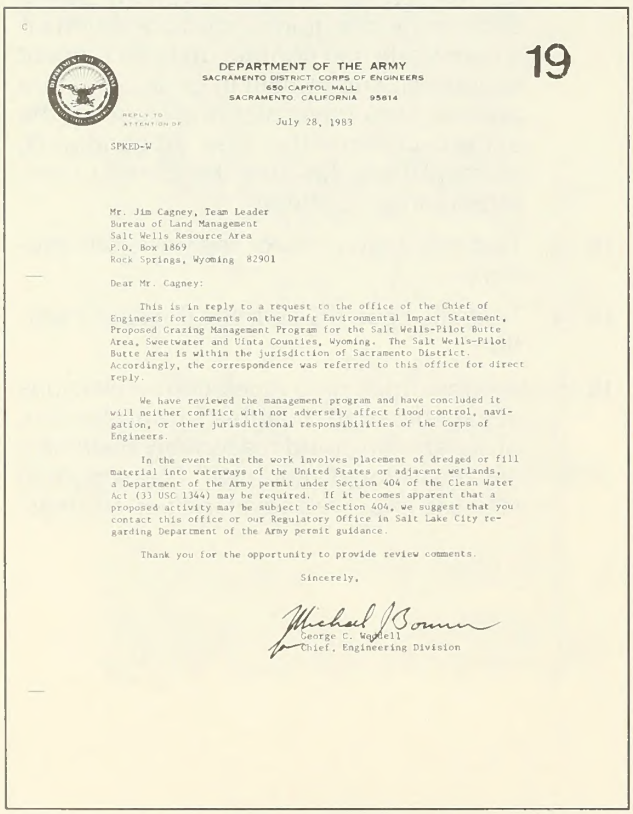
Sincerely,

W. DONALD DEXTER
DIRECTOR
WYOMING GAME AND FISH

WDD:HBM:blh
cc: Game Division
Fish Division

18.16 This section reflects an attempt to identify a value for wildlife, and incorporate this value into a benefit/cost analysis. In the absence of these calculations the Emphasize Watershed, Wildlife Habitat, and Soil Stability Alternative would have shown a benefit/cost ratio substantially below the ratio presented in the document.

Since the benefit/cost analysis will be a significant part of the decision-making process in the future, it is imperative that a methodology acceptable to the Wyoming Game and Fish Department be developed.



19

DEPARTMENT OF THE ARMY
SACRAMENTO DISTRICT, CORPS OF ENGINEERS
650 CAPITOL MALL
SACRAMENTO, CALIFORNIA 95814

REPLY TO ATTENTION OF

July 28, 1983

SPKED-W

Mr. Jim Cagney, Team Leader
Bureau of Land Management
Salt Wells Resource Area
P.O. Box 1869
Rock Springs, Wyoming 82901

Dear Mr. Cagney:

This is in reply to a request to the office of the Chief of Engineers for comments on the Draft Environmental Impact Statement, Proposed Grazing Management Program for the Salt Wells-Pilot Butte Area, Sweetwater and Uinta Counties, Wyoming. The Salt Wells-Pilot Butte Area is within the jurisdiction of Sacramento District. Accordingly, the correspondence was referred to this office for direct reply.

We have reviewed the management program and have concluded it will neither conflict with nor adversely affect flood control, navigation, or other jurisdictional responsibilities of the Corps of Engineers.

In the event that the work involves placement of dredged or fill material into waterways of the United States or adjacent wetlands, a Department of the Army permit under Section 404 of the Clean Water Act (33 USC 1344) may be required. If it becomes apparent that a proposed activity may be subject to Section 404, we suggest that you contact this office or our Regulatory Office in Salt Lake City regarding Department of the Army permit guidance.

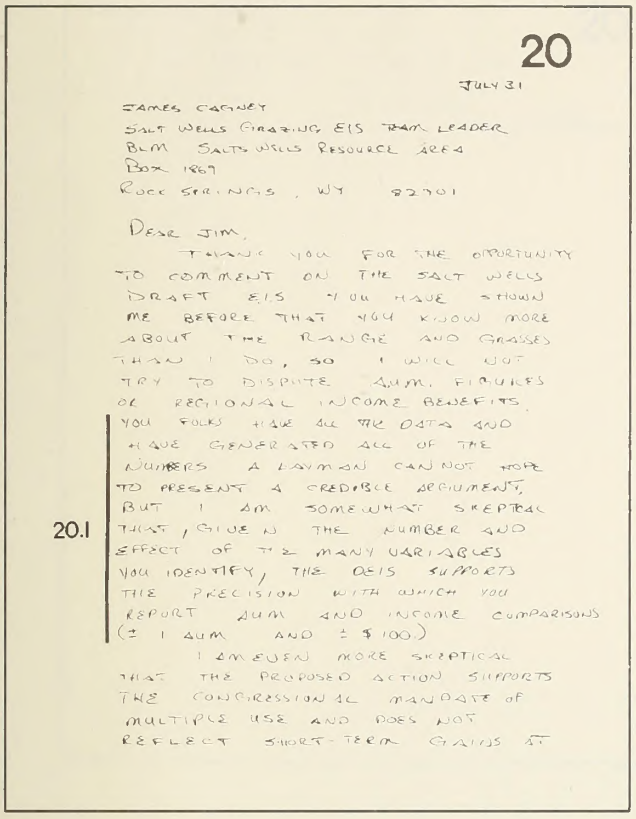
Thank you for the opportunity to provide review comments.

Sincerely,

George C. Wendell
Chief, Engineering Division

RESPONSE TO LETTER NO. 19

Thank you for your comments.



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JULY 31

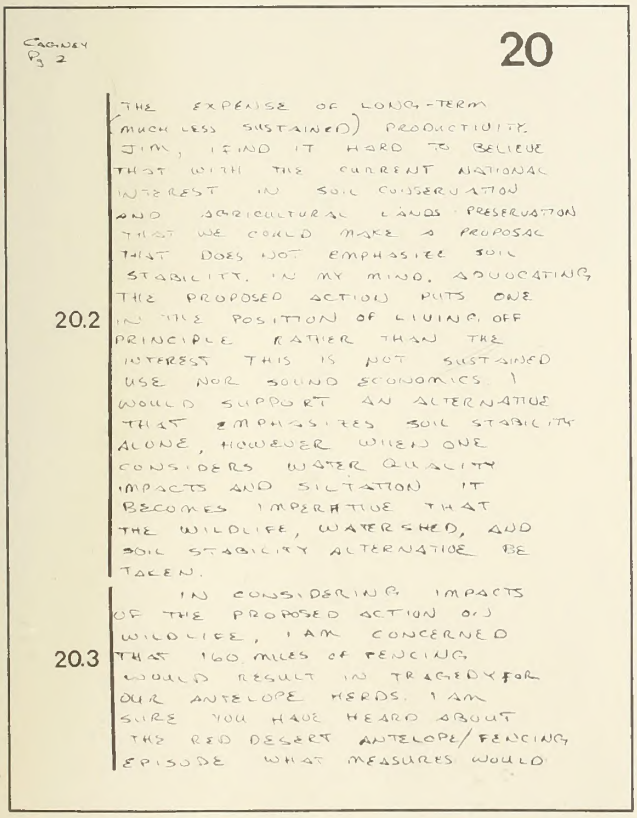
JAMES CAGNEY
SALT WELLS GRAZING EIS TEAM LEADER
BLM SALTS WELLS RESOURCE AREA
BOX 1869
ROCK SPRINGS, WY 82901

DEAR JIM,

THANK YOU FOR THE OPPORTUNITY TO COMMENT ON THE SALT WELLS DRAFT EIS. YOU HAVE SHOWN ME BEFORE THAT YOU KNOW MORE ABOUT THE RANGE AND GRASSES THAN I DO, SO I WILL NOT TRY TO DISPUTE A.U.M. FIGURES OR REGIONAL INCOME BENEFITS.

20.1 YOU FOLKS HAVE ALL THE DATA AND HAVE GENERATED ALL OF THE NUMBERS. A LAYMAN CAN NOT HOPE TO PRESENT A CREDIBLE ARGUMENT, BUT I AM SOMEWHAT SKEPTICAL THAT, GIVEN THE NUMBER AND EFFECT OF THE MANY VARIABLES YOU IDENTIFY, THE EIS SUPPORTS THE PRECISION WITH WHICH YOU REPORT AUM AND INCOME COMPARISONS (± 1 AUM AND ± $100.)

I AM EVEN MORE SKEPTICAL THAT THE PROPOSED ACTION SUPPORTS THE CONGRESSIONAL MANDATE OF MULTIPLE USE AND DOES NOT REFLECT SHORT-TERM GAINS AT



CAGNEY
PG 2

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THE EXPENSE OF LONG-TERM (MUCH LESS SUSTAINED) PRODUCTIVITY.

20.2 JIM, I FIND IT HARD TO BELIEVE THAT WITH THE CURRENT NATIONAL INTEREST IN SOIL CONSERVATION AND AGRICULTURAL LANDS PRESERVATION THAT WE COULD MAKE A PROPOSAL THAT DOES NOT EMPHASIZE SOIL STABILITY. IN MY MIND, ADVOCATING THE PROPOSED ACTION PUTS ONE IN THE POSITION OF LIVING OFF PRINCIPLE RATHER THAN THE INTEREST. THIS IS NOT SUSTAINED USE NOR SOUND ECONOMICS. I WOULD SUPPORT AN ALTERNATIVE THAT EMPHASIZES SOIL STABILITY ALONE, HOWEVER WHEN ONE CONSIDERS WATER QUALITY IMPACTS AND SILTATION IT BECOMES IMPERATIVE THAT THE WILDLIFE, WATERSHED, AND SOIL STABILITY ALTERNATIVE BE TAKEN.

20.3 IN CONSIDERING IMPACTS OF THE PROPOSED ACTION ON WILDLIFE, I AM CONCERNED THAT 160 MILES OF FENCING WOULD RESULT IN TRAGEDY FOR OUR ANTELOPE HERDS. I AM SURE YOU HAVE HEARD ABOUT THE RED DESERT ANTELOPE/FENCING EPISODE. WHAT MEASURES WOULD

RESPONSES TO LETTER NO. 20

20.1 Please see response to 14.1.

20.2 The proposed action is designated to stabilize soil, by improving the environment for plant growth, through more intensive livestock management. While the proposed action does contain an AUM increase of slightly less than 4 percent, this represents an incentive to the livestock industry to cooperate in the range developent program, rather than a short-term approach. Increases in livestock use would not be issued until the monitoring results indicate that the needed forage is available on a sustained yield basis.

20.3 Please see response to 8.2.

20.4 The interlocking land pattern of this area makes it infeasible to completely eliminate livestock use. The results of a similar move by livestock oriented landowners to restrict wildlife from private lands would be dramatic. For this reason we did not feel an alternative involving total removal of livestock would provide a useful, or viable, comparison.

20.5 More complete information on prescribed burns and water developments is available at the BLM Salt Wells Resource Area Office. Prescribed burns are planned for sites with deep loamy and sandy soils. The mandatory two-year rest made possible by incorporating the proposed pasture fences should assure a positive vegetation response. No trees or mountain shrub communities are planned for burning. Juniper may be burned in areas where it has begun to invade deep soil sites adjacent to its historical shallow soil habitat. As a result, no old trees should be burned. Water developments would help pull livestock from riparian areas and guarantee viable pastures from which a management scheme providing periodic rest can be formulated.

Carney p 3

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20.3 BLM TAKE TO ENSURE THIS DOES NOT HAPPEN AGAIN?

IT OCCURS TO ME THAT ALL POSSIBLE ALTERNATIVES WERE NOT CONSIDERED. IN REGARDS TO WILDLIFE, I WOULD BE INTERESTED TO SEE COMPARATIVE FIGURES ON PRODUCTIVITY OF OUR PUBLIC LANDS IF LIVESTOCK WERE NOT ALLOWED AT ALL ON PUBLIC LANDS. I DO NOT ADVOCATE PUTTING MORE PRESSURE ON OUR ALREADY DISTRESSED

20.4 RANCHERS, HOWEVER TO KEEP THINGS IN PERSPECTIVE THIS ALTERNATIVE SHOULD BE CONSIDERED, IN MY OPINION. BECAUSE BEEF CATTLE ARE SUCH POOR CONVERTERS OF FEED TO PROTIEN (16-1 : SOURCE, FOOD FIRST - F.M. LAPPÉ) I WOULD ALSO LIKE TO SEE WHAT COMPARISONS COULD BE MADE ON THE BASIS OF BEEF PROTIEN GENERATED PER A.U.M. VERSUS WILDLIFE PROTIEN PER AUM.

I AM ALSO CONCERNED ABOUT THE FOLLOWING.

20.5 "PRESCRIBED BURNS": HAS A PLAN BEEN DEVELOPED TO DICTATE WHEN AND WHERE THESE WILL OCCUR? I TRUST THAT REQUISITE

Carney p4

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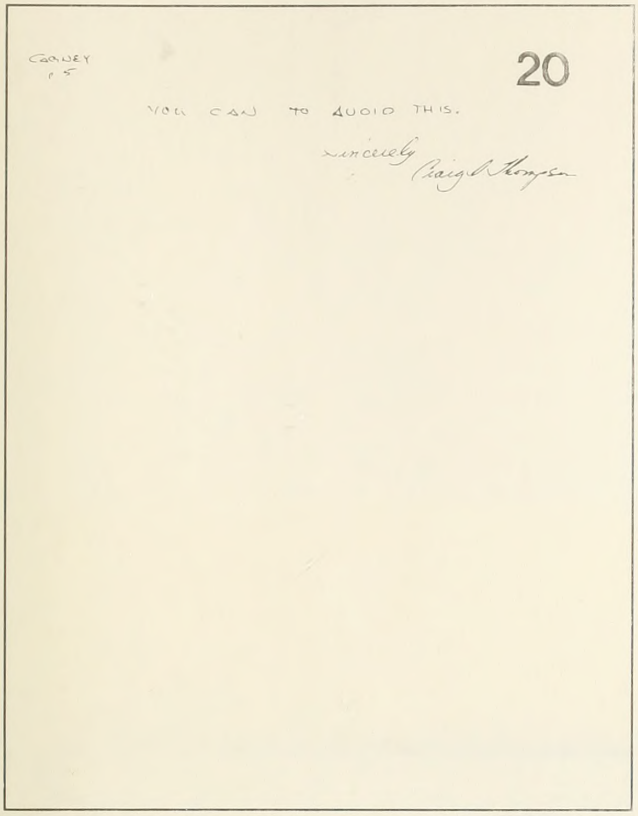
STUDIES HAVE BEEN DONE TO SHOW THAT THESE ARE TRULY BENEFICIAL TO ALL WILDLIFE AND LIVESTOCK, AND THAT THEY WILL BE EXCLUDED FROM JUNIPER, ASPEN, PINE, FIR AND IN THE IMMEDIATE WATERSHEDS.

20.5 2) WATER DEVELOPMENT : THIS HAS BEEN TRADITIONALLY A STATES RIGHTS AREA AND TO ME BLM DEVELOPEMENT OF WATER SOURCES (TO) SEEMS UNNECESARY (HOW HAVE WE DONE WITHOUT THEM UNTILL NOW?- OK,) AND AN UNEEDED SUBSIDY OF LIVESTOCK INTERESTS. (I ALSO DO NOT THINK THAT THE PROPOSED FENCING IS NECESSARY OR COULD BE CONSTRUED AS ANYTHING BUTT AN EXPENSIVE SUBSIDY)

I SUPPORT THE WILDLIFE, WATERSHED AND SOIL STABILITY ALTERNATIVE. IT SEEMS TO ME THAT WITHOUT ADEQUATE SOIL CONSERVATION, WATERSHED PROTECTION AND HEALTHY, ROBUST WILDLIFE HABITAT, WE MIGHT AS WELL JUST CASH OUR ENTIRE ACCOUNT IN, BURN OUR LANDS OUT AND GO FOR MAXIMUM, SHORT-TERM PROFIT AT THE EXPENSE OF FUTURE GENERATIONS.

I KNOW THIS IS NOT YOUR FEELING AND TRUST YOU WILL DO AS MUCH AS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YOU CAN TO AUDIO THIS.
sincerely Craig Thompson

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